

**AFFIDAVIT OF BRAD MILLER**

STATE OF OKLAHOMA            )  
  )       SS.  
COUNTY OF OKLAHOMA        )

I, Brad Miller, being of lawful age and having personal knowledge of the facts stated below, do hereby state upon my oath as follows:

1. I am a partner in the law firm of Miller Johnson Jones Antonisse & White, PLLC (“MJJAW”) and served as lead counsel in Thomas H. Bates v. State Farm Fire & Casualty Company, W.D. Okla. Case No. CIV-21-705-JD.
2. Consistent with MJJAW’s team approach to the practice of law, several attorneys with varying degrees of experience worked on this matter before, during, and after trial, whether they entered an official appearance in the case or not.
3. Since entering the practice of law in 1985, I have tried over 200 criminal and civil cases to jury verdict in state and federal court. Notably, I qualified and served as lead trial counsel for the plaintiff in two multi-million-dollar royalty underpayment class actions certified by Judge David Russell, Hill v. Marathon Oil Co., W.D. Okla. case no. CIV-08-37, and Hill v. Kaiser-Francis Oil Co., W.D. Okla. case no. CIV-09-07. In 2009, I tried a plaintiff case resulting in a \$6,000,000 jury verdict in Stone v. Alterra Healthcare Corp., Oklahoma County case no. CJ-2006-4276. In 2017, I tried a plaintiff case resulting in a \$12,000,000 jury verdict in Leach v. Inland American Midwest City Legacy Corner, LLC, Oklahoma County case no. CJ-2013-5011. In 2019, I tried a plaintiff case resulting in a \$2,400,000 jury verdict in Carbone v. Keith

**EXHIBIT**

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exhibitsticker.com

Sinclair d/b/a Easy Rent, Ltd., Jackson County case no. CJ-2017-98. In 2021, I tried a plaintiff case resulting in a \$15,000,000 jury verdict in Harris v. Frontier State Bank et al., Oklahoma County case no. CJ-2017-5752.

4. I have represented dozens of other plaintiffs as lead counsel in all manner of civil actions involving extensive litigation which ultimately resulted in million- and multi-million-dollar settlements. These have included several actions against insurers for breach of contract and bad faith claims handling. It is typical for my work on such matters to result in effective hourly rates in excess of \$1,000.00, which includes cases resolved in 2022.
5. MJJAW has a very busy, full-time practice working on several complex matters in litigation at once. We work as a team with several lawyers and legal assistants to move these cases to resolution, always with the knowledge of 3-4 times the number of similarly situated cases are in the queue. There was no shortage of equally important cases, and certainly more lucrative matters to MJJAW, waiting in a holding pattern while I was involved in the intense preparations for the Bates federal jury trial.
6. This case not only involves the “preclusion of other work” factor discussed in Burk, but also the “undesirability” factor. This case at its core involved only the ACV value of the composition shingles to a single family, rental house. State Farm practices the filing of offers of judgment early in litigation in amounts several times higher than the base value of the dispute in spite of denying the claim in real time. This is a good strategic move in litigation because it thrusts a great deal of risk for fee- and cost-shifting onto their insureds and their counsel. State Farm then litigates the matter

vigorously and on multiple factual fronts, with great resources, including excellent lawyers from large, integrated firms. State Farm's strategy makes these cases even more financially undesirable from the point of view of plaintiff's counsel. From what I have seen, firms able to navigate the many pitfalls on the path to a jury and willing to take on the financial risk through a trial are small in number. Only the need to bring State Farm's actions to light can possibly justify a firm taking a case like Bates, which is an aspect of practicing law so often neglected by the practical considerations of running a law business. This seems to be the very purpose of the Burk bonus allowance.

7. Shawna Landeros also served as trial counsel in the Bates case. Ms. Landeros obtained law degrees in Canada and in the U.S., graduating from OCU in 2013. She worked as a claims adjuster prior to practicing law. She joined MJJAW in 2020 and is the firm's most senior associate. She routinely takes the lead on insurance defense files and second-chairs plaintiff cases involving insurance law.
8. Jami Rhoades Antonisse has the most federal court experience of any attorney in the firm, having served as a Law Clerk to the Honorable James H. Payne in the Eastern District of Oklahoma. She has been a partner in the firm since its inception in 2014 and is responsible for legal research, motion practice, briefing, and appeals, to include the supervision of other lawyers and staff who assist in this work. She was actively involved in the preparation and trial of this case and will take the lead on any appeal.
9. Amy Taylor was in attendance during the entire trial. She tried several jury cases with the Cleveland County District Attorney's Office before coming to our firm. Her

involvement at trial was instrumental due to her understanding of the practical application of the evidence code, courtroom instincts gathered from first-hand experience, and ability to read jurors' reactions to all manner of stimuli which cannot possibly be observed by lawyers inside the bar. Like many other time entries which were "no charged" in an effort to avoid dispute on the submitted bill, however, Ms. Taylor's time while assisting in the courtroom was not included.

10. In addition to the lawyers participating in front of the jury, State Farm similarly had at least two additional attorneys, Taylor Peshehonoff from Gable Gotwals and Patrick Gormley, in-house counsel for State Farm, in attendance through the trial. They were clearly involved in providing legal assistance to Defendant's trial counsel who operated inside the bar.
11. MJJAW typically accepts plaintiff cases on a contingency basis, as it is literally the only way the vast majority of plaintiffs can possibly secure legal representation adequate to the monumental task of engaging in litigation with multi-billion-dollar entities like State Farm. In all cases, however, including this one, contemporaneous time records are maintained in Clio, the firm's law practice management system.
12. I have personally reviewed the time records maintained in the Bates case. I have removed all time which was unrelated to trial. I have also removed, reduced, or "no charged" any time which in my view was unnecessarily duplicative and/or possibly debatable. The audited time records are attached hereto as Exhibit A. I believe the time spent and work performed to be reasonable and necessary to the outcome achieved.

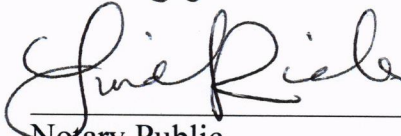


13. On defense files for long-standing institutional clients who pay for our legal services on a monthly or quarterly basis without fail, MJJAW's partners charge between \$175 and \$215 per hour for routine matters. The rates for associates on such matters range from \$165 to \$190 per hour and, for legal assistants, from \$80 to \$100 per hour. In the past, I have charged \$300 per hour for "occasional" or "singular" clients of comparable size and worth to State Farm who have hired me to represent them in matters of similar complexity. I currently quote at least \$450 per hour when approached about work of this sort.
14. Based on my experiences representing both plaintiffs and defendants in bad faith insurance cases such as this one, I believe the requested hourly rates of \$350 for partners, \$300 for associates, and \$100 for legal assistants are reasonable. I specifically note that these rates are commensurate with those requested by plaintiff's counsel in the last bad faith case I tried to verdict on the defense side. [See the May 2021 jury verdict and January 2022 application for attorney fees filed of record in Seminole County Case No. CJ-2012-109.] Notably, the reasonableness of the rate was not contested by my insurance company client in that case.
15. These rates are also within reasonable limits in this jurisdiction. [See, e.g., Exhibit B, OBA Membership Survey 2013 (excerpts) (noting that approximately 35% of respondents charged \$151-\$200 per hour; 23% charged \$201-\$250 per hour; 9% charged \$251-\$300 per hour; and 5% charged over \$300 per hour).]

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
Brad Miller

SUBSCRIBED AND SWORN BEFORE ME this 22<sup>nd</sup> day of November, 2022.

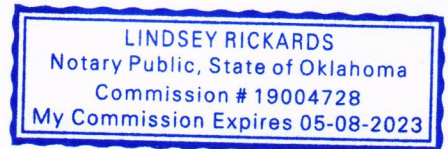
  
\_\_\_\_\_  
Notary Public

My Commission Expires:

05-08-2023

Commission Number:

19004728



**Miller Johnson Jones Antonisse & White****INVOICE**

500 NW 6th Street, Suite 300  
 Oklahoma City, Oklahoma 73102  
 Phone: (405) 896-4388

Invoice # 4400  
 Date: 11/22/2022  
 Due On: 12/22/2022

Gary Bates

**01568**

**Thomas Bates v State Farm**

Type	Date	Attorney	Notes	Quantity	Rate	Total
Service	04/22/2021	DLH	Schedule appointment w Bates	0.30	\$100.00	\$30.00
Service	04/24/2021	DLH	Download documents from client	0.10	\$100.00	\$10.00
Service	04/28/2021	RBM	Meet with Gary and Marian Bates; review client documents	3.90	\$350.00	\$1,365.00
Service	04/28/2021	SLL	Review and analyze and summarize documentation from Gary Bates to prepare for client meeting.	1.80	\$300.00	\$540.00
Service	04/28/2021	SLL	Meet with Gary and Marian Bates regarding claim with State Farm.	2.50	\$300.00	\$750.00
Service	05/05/2021	SLL	Call from Gary Bates regarding documentation gathered, additional information	0.20	\$300.00	\$60.00
Service	05/06/2021	SLL	Review and analyze email from Gary Bates regarding roof age, bringing contingency fee agreement and policy	0.20	\$300.00	\$60.00
Service	06/09/2021	SLL	Review and analyze and summarize additional documents received from Thomas Bates including policy, roof replacement documentation, additional correspondence with State Farm.	1.20	\$300.00	\$360.00
Service	06/09/2021	SLL	Prepare email correspondence to Gary Bates regarding request for additional documentation, no responses to certain emails to State Farm, no denial letter noted in documents received	0.30	\$300.00	\$90.00
Service	06/09/2021	SLL	Prepare Petition.	2.50	\$300.00	\$750.00
Service	06/09/2021	SLL	Communicate via telephone with Oklahoma Insurance Department regarding complaint filed.	0.40	\$300.00	\$120.00

**EXHIBIT****3.A**

Service	06/09/2021	SLL	Review case law on who may bring suit, Thomas Bates insured on policy	0.50	\$300.00	\$150.00
Service	06/09/2021	DLH	Prepare EOA	0.20	\$100.00	\$20.00
Service	06/10/2021	SLL	Review and analyze four emails from Gary Bates with attachments, dec page, photographs and compare photographs to prior photographs received	0.80	\$300.00	\$240.00
Service	06/10/2021	SLL	Prepare email correspondence to Gary Bates regarding Petition.	0.20	\$300.00	\$60.00
Service	06/10/2021	SLL	Review and respond to email from Gary Bates regarding what would happen if Thomas Bates passed away	0.40	\$300.00	\$120.00
Service	06/10/2021	SLL	Call from Gary Bates with questions regarding Petition naming Thomas Bates	0.40	\$300.00	\$120.00
Service	06/10/2021	SLL	Review email correspondence from Gary Bates regarding descriptions of calls with State Farm	0.20	\$300.00	\$60.00
Service	06/10/2021	RBM	Review and revise draft petition	0.80	\$350.00	\$280.00
Service	06/11/2021	SLL	Communicate in person with Jonathan Marks with Aegis Roofing regarding his file, communications with State Farm and Bateses	0.50	\$300.00	\$150.00
Service	06/15/2021	SLL	Communicate via telephone with Gary Bates regarding approval of filing of Petition.	0.30	\$300.00	\$90.00
Service	06/15/2021	SLL	Inbound call from Eve Anderson with Aegis Roofing regarding our request for file.	0.20	\$300.00	\$60.00
Service	06/25/2021	DLH	Review green card, State Farm served via OK Ins Department	0.10	\$100.00	\$10.00
Service	07/16/2021	SLL	Review and analyze Notice of Removal	0.20	\$300.00	\$60.00
Service	07/16/2021	SLL	Review Corporate disclosure of State Farm	0.20	\$300.00	\$60.00
Service	07/16/2021	SLL	Review EOAs for Lance Leffel and Paula Williams	0.20	\$300.00	\$60.00
Service	07/19/2021	SLL	Review Notice of filing of notice of removal	0.10	\$300.00	\$30.00
Service	08/09/2021	DLH	Prepare federal EOA's for Lance Leffel and Paula Williams	0.10	\$100.00	\$10.00
Service	08/09/2021	DLH	Prepare federal EOAs for Brad Miller and Shawna Landeros	0.20	\$0.00	\$0.00
Service	08/10/2021	SLL	Review and analyze State Farm's Answer.	0.50	\$300.00	\$150.00



Service	08/10/2021	SLL	Review Order for Status Conference.	0.20	\$300.00	\$60.00
Service	08/25/2021	SLL	Attend Rule 26 discovery conference with Paula Williams	0.80	\$300.00	\$240.00
Service	08/31/2021	SLL	Prepare Plaintiff's portion of Joint Status Report.	1.70	\$300.00	\$510.00
Service	08/31/2021	DLH	Prepare EOA for Logan Johnson	0.10	\$100.00	\$10.00
Service	09/01/2021	SLL	Prepare email correspondence to Paula Williams and Lance Leffel regarding Joint Status Report	0.20	\$300.00	\$60.00
Service	09/03/2021	SLL	Review and analyze Protective Order.	1.00	\$300.00	\$300.00
Service	09/03/2021	SLL	Review and analyze State Farm's additions to Joint Status Report.	0.80	\$300.00	\$240.00
Service	09/03/2021	SLL	Review and analyze Offer of Judgment.	0.20	\$300.00	\$60.00
Service	09/03/2021	SLL	Prepare email correspondence to Paula Williams regarding Joint Status Report and Protective Order.	0.20	\$300.00	\$60.00
Service	09/03/2021	SLL	Review and analyze Unopposed Motion for Protective Order.	0.30	\$300.00	\$90.00
Service	09/06/2021	SLL	Prepare email correspondence to Gary Bates regarding Offer of Judgment	0.30	\$300.00	\$90.00
Service	09/07/2021	SLL	Inbound call from Gary Bates regarding offer of judgment, explanation, rejection, he will confirm in writing	0.40	\$300.00	\$120.00
Service	09/07/2021	SLL	Review email from Gary Bates regarding rejection of Offer of Judgment, he consulted with Thomas Bates who agrees	0.20	\$300.00	\$60.00
Service	09/07/2021	SLL	Review email from Lance Leffel regarding status conference.	0.10	\$300.00	\$30.00
Service	09/07/2021	SLL	Prepare email to Nyssa Vasquez regarding status conference	0.10	\$300.00	\$30.00
Service	09/07/2021	DLH	Review email from Nyssa Vasquez regarding Status Conference with Judge Dishman	0.20	\$100.00	\$20.00
Service	09/08/2021	SLL	Review Aegis Roofing file.	1.80	\$300.00	\$540.00
Service	09/08/2021	SLL	Prepare Rule 26 Initial Disclosures.	1.20	\$300.00	\$360.00
Service	09/08/2021	SLL	Review and analyze Initial Disclosures from State Farm.	0.50	\$300.00	\$150.00
Service	09/12/2021	JLJ	Begin analysis of all file materials in preparation for Status Conference before	2.00	\$350.00	\$700.00

Judge Dishman						
Service	09/13/2021	JLJ	Finalize analysis of file materials in preparation for Status Conference before Judge Dishman	1.00	\$350.00	\$350.00
Service	09/13/2021	SLL	Review Scheduling Order	0.30	\$300.00	\$90.00
Service	09/13/2021	JLJ	Attend Status Conference before Judge Dishman	1.00	\$350.00	\$350.00
Service	09/13/2021	DLH	Review Notice of Change of Address filed by Lance Leffel	0.10	\$100.00	\$10.00
Service	09/21/2021	SLL	Compare and contrast chronology of events between client documents and Aegis file.	1.60	\$300.00	\$480.00
Service	09/21/2021	SLL	Prepare first set of interrogatories, requests for production, and requests for admission to State Farm.	2.00	\$300.00	\$600.00
Service	09/21/2021	SLL	Prepare email correspondence to Paula Williams regarding production of initial disclosures, claim file and policy.	0.20	\$300.00	\$60.00
Service	09/21/2021	SLL	Review email from Paula Williams regarding upcoming document production.	0.10	\$300.00	\$30.00
Service	09/21/2021	SLL	Prepare correspondence to Eve with Aegis regarding estimate for Bates property on Elwood	0.20	\$300.00	\$60.00
Service	09/23/2021	SLL	Compare insurance policy produced by State Farm with one from Bates.	1.00	\$300.00	\$300.00
Service	09/23/2021	SLL	Prepare documents for production listed in initial disclosures pursuant to Scheduling Order.	1.90	\$300.00	\$570.00
Service	09/23/2021	SLL	Prepare memo to file regarding review of file and analysis of client documentation and Aegis documentation	0.40	\$300.00	\$120.00
Service	09/24/2021	SLL	Review and analyze estimate from Jonathan Marks	0.50	\$300.00	\$150.00
Service	10/20/2021	SLL	Review and analyze Defendant's Interrogatories, Requests for Production and Request for Inspection.	0.60	\$300.00	\$180.00
Service	10/20/2021	SLL	Prepare correspondence to Gary Bates regarding discovery requests from State Farm	0.20	\$300.00	\$60.00
Service	10/27/2021	SLL	Review and analyze State Farm's responses to our Interrogatories, Requests for Production and Requests for Admission.	1.40	\$300.00	\$420.00

Service	10/27/2021	SLL	Review and analyze (begin) and create summary of document production from State Farm (1 - 144)	3.20	\$300.00	\$960.00
Service	11/01/2021	SLL	Finalize review and summary of State Farm claim file with analysis of strategy.	7.50	\$300.00	\$2,250.00
Service	11/01/2021	RBM	Review and analyze State Farm Discovery Responses and summaries of same	7.20	\$350.00	\$2,520.00
Service	11/02/2021	RBM	Continue review of State Farm Production	8.20	\$350.00	\$2,870.00
Service	11/04/2021	SLL	Review historical images of Elwood property on google earth	0.50	\$300.00	\$150.00
Service	11/09/2021	SLL	Prepare email correspondence to Ben Baker regarding similar issues in other cases.	0.20	\$300.00	\$60.00
Service	11/16/2021	SLL	Prepare (begin) responses to State Farm's discovery requests	1.90	\$300.00	\$570.00
Service	11/17/2021	SLL	Communications with Paula Williams regarding extension on discovery responses	0.20	\$300.00	\$60.00
Service	11/30/2021	SLL	Prepare (finalize) responses to Defendant's discovery.	2.20	\$300.00	\$660.00
Service	11/30/2021	SLL	Prepare email correspondence to Gary Bates regarding discovery and additional documentation needed.	0.30	\$300.00	\$90.00
Service	11/30/2021	SLL	Prepare email correspondence to Paula Williams regarding extension on discovery responses and review response.	0.20	\$300.00	\$60.00
Service	12/01/2021	RBM	Review file and revise discovery responses	3.70	\$350.00	\$1,295.00
Service	12/03/2021	SLL	Review email from Gary Bates approving discovery responses	0.10	\$300.00	\$30.00
Service	12/03/2021	DLH	Prepare and send plaintiff discovery responses and production in final format	2.50	\$100.00	\$250.00
Service	12/14/2021	SLL	Review and analyze additional client documents including emails, correspondence, text messages, and prepare summary, chronologically with comparison with Aegis chronology	3.30	\$300.00	\$990.00
Service	12/14/2021	SLL	Review and respond to email from Allyson Shumaker regarding document production, missing production from State Farm.	0.30	\$300.00	\$90.00
Service	12/14/2021	SLL	Prepare document production responsive to Defendant's Requests for Production.	2.50	\$300.00	\$750.00

Service	12/15/2021	RBM	Review texts on roof claim between Jacqueline Draper and Tressa Jacome; review claim file	5.70	\$350.00	\$1,995.00
Service	01/07/2022	SLL	Review email from Paula Williams regarding document production and Joint Status Report.	0.20	\$300.00	\$60.00
Service	01/07/2022	SLL	Review (briefly) document production to determine if all documents indicated to be produced were produced.	0.40	\$300.00	\$120.00
Service	01/07/2022	SLL	Prepare Joint Status Report.	2.20	\$300.00	\$660.00
Service	01/07/2022	SLL	Prepare email correspondence to Paula Williams regarding missing production.	0.20	\$300.00	\$60.00
Service	01/07/2022	SLL	Review email from Paula Williams regarding will check on missing production.	0.10	\$300.00	\$30.00
Service	01/07/2022	SLL	Review subpoena to Aegis Roofing.	0.50	\$300.00	\$150.00
Service	01/07/2022	SLL	Prepare email correspondence to Jonathan Marks regarding subpoena.	0.20	\$300.00	\$60.00
Service	01/07/2022	SLL	Prepare correspondence to Paula Williams regarding proposed Joint Status Report	0.20	\$300.00	\$60.00
Service	01/10/2022	SLL	Review email from Paula Williams regarding production of financial documents	0.20	\$300.00	\$60.00
Service	01/10/2022	SLL	Review edits from Paula Williams on Joint Status Report and finalize for filing	0.30	\$300.00	\$90.00
Service	01/11/2022	SLL	Review emails from Paula Williams regarding depositions, inspection	0.30	\$300.00	\$90.00
Service	01/13/2022	SLL	Inbound call from Jonathan Marks regarding subpoena	0.30	\$300.00	\$90.00
Service	01/17/2022	ADP	Continued summarizing discovery produced 1/7/22 for response sufficiency	1.20	\$300.00	\$360.00
Service	01/18/2022	ADP	Continued summarizing discovery production 1/7/22 for response sufficiency	0.50	\$300.00	\$150.00
Service	01/26/2022	SLL	Review email correspondence from Paula Williams regarding supplemental document production (annual statements), depositions, inspection.	0.30	\$300.00	\$90.00
Service	01/26/2022	SLL	Prepare email correspondence to Gary Bates regarding inspection, depositions.	0.20	\$300.00	\$60.00
Service	01/31/2022	SLL	Review email from Gary Bates regarding depositions and inspection.	0.20	\$300.00	\$60.00
Service	01/31/2022	SLL	Prepare email correspondence to Paula	0.20	\$300.00	\$60.00

			Williams regarding inspection and depositions of Bateses.			
Service	01/31/2022	SLL	Communicate in firm with Brad Miller, Logan Johnson and Jami Antonisse regarding depositions, expert, strategy	0.50	\$300.00	\$150.00
Service	01/31/2022	SLL	Prepare email correspondence to Paula Williams regarding depositions of four State Farm employees involved in claim	0.20	\$300.00	\$60.00
Service	02/08/2022	SLL	Review email from Paula Williams regarding depositions and inspection.	0.20	\$300.00	\$60.00
Service	02/08/2022	SLL	Communicate via telephone with Gary Bates regarding deposition preparation, including Thomas Bates and Marian Bates, and inspection	0.40	\$300.00	\$120.00
Service	02/08/2022	SLL	In-firm meeting with Brad Miller, Logan Johnson and Jami Antonisse regarding expert strategy, inspection	0.30	\$300.00	\$90.00
Service	02/08/2022	SLL	Prepare email correspondence to Gary Bates regarding inspection, deposition preparation and depositions	0.20	\$300.00	\$60.00
Service	02/08/2022	SLL	Review email from Gary Bates, agreement with plan, deposition preparation	0.10	\$300.00	\$30.00
Service	02/09/2022	SLL	Review State Farm discovery responses for deficiencies.	0.80	\$300.00	\$240.00
Service	02/09/2022	ADP	Begin summarizing State Farm's supplemental discovery responses from 1/7/22, including 1006 pages of OGs	5.40	\$300.00	\$1,620.00
Service	02/09/2022	SLL	Email communications with Paula Williams regarding depositions	0.20	\$300.00	\$60.00
Service	02/09/2022	SLL	Communicate via telephone with Paula Williams regarding discovery deficiencies.	0.50	\$300.00	\$150.00
Service	02/10/2022	ADP	Continued summarizing State Farm's policies and procedures.	6.40	\$300.00	\$1,920.00
Service	02/11/2022	ADP	Continued summarizing State Farm's produced policies and procedures for response sufficiency	2.10	\$300.00	\$630.00
Service	02/11/2022	RBM	Prepare for meeting with Jonathon Marks	2.20	\$350.00	\$770.00
Service	02/11/2022	SLL	Plan and prepare for meeting with Jonathan Marks by reviewing Aegis file, claim file, communications between Bates and Marks.	1.50	\$300.00	\$450.00
Service	02/11/2022	SLL	Attend meeting with Jonathan Marks.	1.30	\$300.00	\$390.00



Service	02/11/2022	SLL	Prepare email correspondence to Paula Williams regarding request for documents received via subpoena to Aegis.	0.20	\$300.00	\$60.00
Service	02/11/2022	SLL	Communicate via telephone with Corbin Swain, PE regarding inspection of Bates roof.	0.40	\$300.00	\$120.00
Service	02/11/2022	SLL	Prepare email correspondence to Corbin Swain, PE, regarding request for documentation	0.20	\$300.00	\$60.00
Service	02/11/2022	RBM	Meet with Jonathon Marks	1.30	\$350.00	\$455.00
Service	02/14/2022	ADP	Continued summarizing State Farm produced policies and procedures.	7.00	\$300.00	\$2,100.00
Service	02/14/2022	RBM	Prepare to meet with Thomas, Gary and Marian Bates	2.40	\$350.00	\$840.00
Service	02/14/2022	SLL	Prepare for deposition preparation of Thomas, Gary and Marian Bates by reviewing discovery responses, production.	1.80	\$300.00	\$540.00
Service	02/14/2022	SLL	Attend deposition preparation meeting with Thomas Bates, Gary Bates, and Marian Bates.	3.50	\$300.00	\$1,050.00
Service	02/14/2022	SLL	Review email from Jonathan Marks with updated estimate, price increases due to materials pricing	0.60	\$300.00	\$180.00
Service	02/14/2022	SLL	Review email from Kari Cyrs regarding subpoenaed documents from Aegis Roofing.	0.10	\$300.00	\$30.00
Service	02/14/2022	SLL	Review email correspondence from Paula Williams regarding deposition of Arnold and Dunnican-Jacome	0.20	\$300.00	\$60.00
Service	02/14/2022	RBM	Meet with Bates family re: Depo prep	3.50	\$350.00	\$1,225.00
Service	02/15/2022	ADP	Continued summarizing State Farm's produced policies and procedures.	3.60	\$300.00	\$1,080.00
Service	02/16/2022	SLL	Review and respond to email from Jonathan Marks regarding inspection.	0.20	\$300.00	\$60.00
Service	02/16/2022	SLL	Review photos, CV, and email from Corbin Swain, PE.	1.80	\$300.00	\$540.00
Service	02/16/2022	SLL	Communicate with Paula Williams regarding inspection.	0.20	\$300.00	\$60.00
Service	02/16/2022	SLL	Communicate with Gary Bates regarding inspection.	0.20	\$300.00	\$60.00
Service	02/16/2022	SLL	Review and analyze email correspondence	0.40	\$300.00	\$120.00

			from Paula Williams regarding discovery deficiencies, some supplementation and some continued objections, and compare to State Farm responses			
Service	02/17/2022	SLL	Email correspondence with Gary Bates regarding inspection.	0.20	\$300.00	\$60.00
Service	02/17/2022	SLL	Email correspondence with Paula Williams regarding inspection.	0.20	\$300.00	\$60.00
Service	02/17/2022	SLL	Email correspondence with Jonathan Marks regarding inspection	0.20	\$300.00	\$60.00
Service	02/25/2022	ADP	Continued summarizing SF 1-7-22 policies and procedures.	7.40	\$300.00	\$2,220.00
Service	02/28/2022	ADP	Continued summarizing SF's discovery production of policies and procedures for response sufficiency	2.10	\$300.00	\$630.00
Service	03/01/2022	SLL	In-firm meeting with Brad Miller, Loan Johnson and Jami Antonisse regarding strategy in case, experts, whether to retain Swain	0.60	\$300.00	\$180.00
Service	03/01/2022	SLL	Communicate via telephone with Paula Williams regarding proposed extension of deadlines.	0.20	\$300.00	\$60.00
Service	03/02/2022	ADP	Continued summarizing SF policies and procedures.	1.20	\$300.00	\$360.00
Service	03/03/2022	ADP	Finished summarizing SF discovery 1/7/22	2.80	\$300.00	\$840.00
Service	03/04/2022	SLL	Review email from Paula Williams regarding no opposition to Motion to extend deadlines.	0.10	\$300.00	\$30.00
Service	03/04/2022	SLL	Prepare Unopposed motion to Extend deadlines.	1.10	\$300.00	\$330.00
Service	03/04/2022	SLL	Review email correspondence from Paula Williams regarding supplemental responses	0.30	\$300.00	\$90.00
Service	03/04/2022	SLL	In-firm meeting with Brad Miller regarding discovery issues, other claim files, what documentation State Farm is still objecting to.	1.30	\$300.00	\$390.00
Service	03/04/2022	SLL	Communicate via email with Paula Williams regarding discovery issues, ROGs 16, 17, RFP 19, and production for RFPs 5, 21, and 22	0.40	\$300.00	\$120.00
Service	03/05/2022	RBM	Review State Farm Discovery Production and ADP summary of same	7.90	\$350.00	\$2,765.00

Service	03/07/2022	SLL	Attend deposition preparation session with Gary Bates, Marian Bates, and Thomas Bates	4.00	\$300.00	\$1,200.00
Service	03/07/2022	DLH	Download and identify defendant production	1.00	\$100.00	\$100.00
Service	03/07/2022	RBM	Continue deposition preparation meetings with Thomas, Gary and Marian Bates	4.00	\$350.00	\$1,400.00
Service	03/08/2022	SLL	Review and analyze Order denying our Motion to extend deadlines without prejudice.	0.50	\$300.00	\$150.00
Service	03/08/2022	SLL	Prepare Plaintiff's Expert Witness List	1.70	\$300.00	\$510.00
Service	03/09/2022	RBM	In-firm meeting with Logan Johnson and Jami Antonisse re: discovery and strategy issues	1.20	\$350.00	\$420.00
Service	03/09/2022	SLL	Review email from Paula Williams regarding depositions of Bates.	0.10	\$300.00	\$30.00
Service	03/09/2022	DLH	Download and identify Defendant supplemental production	0.20	\$100.00	\$20.00
Service	03/09/2022	SLL	Communicate via telephone with Gary Bates regarding depositions of Gary, Marian and Thomas Bates on Friday, other depositions.	0.20	\$300.00	\$60.00
Service	03/09/2022	SLL	Prepare email correspondence to Paula Williams regarding depositions in this case.	0.20	\$300.00	\$60.00
Service	03/09/2022	SLL	Review email from Paula Williams regarding production of other similar claim files, but not photographs or estimates	0.20	\$300.00	\$60.00
Service	03/09/2022	SLL	Prepare email to Paula Williams regarding why claim files take so long to produce.	0.20	\$300.00	\$60.00
Service	03/09/2022	SLL	Review additional production from State Farm, 1589-1597 and comparison of photos to photos in claim file	1.40	\$300.00	\$420.00
Service	03/09/2022	SLL	Prepare email correspondence to Jonathan Marks regarding inspection.	0.20	\$300.00	\$60.00
Service	03/10/2022	SLL	Review and analyze email correspondence from Paula Williams regarding pulling claim files, time commitments involved, limited production	0.30	\$300.00	\$90.00
Service	03/11/2022	SLL	Attend depositions of Thomas Bates, Marian Bates, and Gary Bates	8.20	\$300.00	\$2,460.00
Service	03/14/2022	SPM	Attend Roof Inspection on site	2.00	\$100.00	\$200.00

Service	03/14/2022	RBM	Prepare for first deposition - Anthony Mendoza	5.00	\$350.00	\$1,750.00
Service	03/14/2022	SLL	Review email correspondence from Gary Bates regarding thoughts on depositions.	0.30	\$300.00	\$90.00
Service	03/14/2022	SLL	Review email from Paula Williams regarding deposition of Jonathan Marks.	0.20	\$300.00	\$60.00
Service	03/14/2022	SLL	Communicate via email correspondence with Jonathan Marks regarding deposition.	0.20	\$300.00	\$60.00
Service	03/14/2022	SLL	Review email from Jonathan Marks regarding deposition	0.10	\$300.00	\$30.00
Service	03/14/2022	SLL	Email communications with Paula Williams regarding deposition of Jonathan Marks.	0.30	\$300.00	\$90.00
Service	03/15/2022	SLL	Prepare email correspondence to Gary Bates regarding depositions of State Farm employees	0.20	\$300.00	\$60.00
Service	03/16/2022	SLL	Prepare email correspondence to Paula Williams regarding additional production, brochure referenced in Bates' deposition	0.10	\$300.00	\$30.00
Service	03/16/2022	DLH	Prepare State Farm Brochure for production.	0.30	\$100.00	\$30.00
Service	03/17/2022	RBM	Continued preparation for deposition of Anthony Mendoza	8.50	\$350.00	\$2,975.00
Service	03/17/2022	SLL	Review and analyze and prepare summary of State Farm production 1357 - 1597.	2.90	\$300.00	\$870.00
Service	03/17/2022	SLL	Prepare for deposition of Anthony Mendoza by comparing all photographs from Aegis, Bates, and in claim file to determine who took the photographs in claim file	1.70	\$300.00	\$510.00
Service	03/18/2022	ADP	Compared the versions of OG-75-160 for differences. Reviewed produced video 4110, compared it to OG-75-160, and took screenshots of the examples of bruising.	3.10	\$300.00	\$930.00
Service	03/18/2022	RBM	Depose Anthony Mendoza	6.00	\$350.00	\$2,100.00
Service	03/18/2022	SLL	Prepare for deposition of Anthony Mendoza by preparing exhibits for use in deposition	1.00	\$300.00	\$300.00
Service	03/18/2022	SLL	Attend deposition of Anthony Mendoza	6.00	\$300.00	\$1,800.00
Service	03/20/2022	RBM	Prepare for deposition of Tresa Dunnican-Jacome	8.00	\$350.00	\$2,800.00
Service	03/21/2022	SLL	Perform background research on Tresa Dunnican-Jacome.	1.50	\$300.00	\$450.00

Service	03/21/2022	SLL	Review training videos produced by State Farm.	3.80	\$300.00	\$1,140.00
Service	03/21/2022	SLL	Review documents produced by Aegis Roofing in response to subpoena.	2.30	\$300.00	\$690.00
Service	03/22/2022	ADP	Prepared exhibits 5a-c and 6a-b	0.60	\$300.00	\$180.00
Service	03/22/2022	RBM	Continued depo prep for Tresa Jacome	6.30	\$350.00	\$2,205.00
Service	03/22/2022	SLL	Prepare final witness list.	2.10	\$300.00	\$630.00
Service	03/22/2022	SLL	Prepare final exhibit list.	2.50	\$300.00	\$750.00
Service	03/22/2022	SLL	Review expert witness list of Defendant.	0.40	\$300.00	\$120.00
Service	03/22/2022	SLL	Review claim file to respond to questions of Brad Miller in advance of deposition of Tresa Dunnican-Jacome	0.50	\$300.00	\$150.00
Service	03/22/2022	RBM	Review and revise final witness and exhibit lists	0.80	\$350.00	\$280.00
Service	03/23/2022	ADP	Prepared exhibits 5b.2, 8, and 9.	0.50	\$300.00	\$150.00
Service	03/23/2022	DLH	Upload exhibits for Tresa Dunnican-Jacome deposition	0.30	\$100.00	\$30.00
Service	03/24/2022	RBM	Finalize prep for deposition of Tresa Jacome	4.00	\$350.00	\$1,400.00
Service	03/25/2022	RBM	Depose Tressa Jacome	8.00	\$350.00	\$2,800.00
Service	03/25/2022	SLL	Attend deposition of Tresa Dunnican-Jacome	8.00	\$300.00	\$2,400.00
Service	03/28/2022	DLH	Upload exhibits for deposition of Anthony Mendoza	0.50	\$100.00	\$50.00
Service	03/29/2022	RBM	Prepare for Sharon Arnold deposition	4.50	\$350.00	\$1,575.00
Service	03/29/2022	SLL	Prepare email correspondence to Jonathan Marks regarding deposition, designation of his expert testimony, deposition preparation	0.20	\$300.00	\$60.00
Service	04/01/2022	ADP	Reviewed OGs for locations where the adjuster was required to place a note in the file.	1.40	\$300.00	\$420.00
Service	04/01/2022	JLJ	In-firm meeting with Brad Miller and Shawna Landeros regarding preparation for deposition	0.50	\$350.00	\$175.00
Service	04/01/2022	RBM	Prepare for Sharon Arnold deposition	5.20	\$350.00	\$1,820.00
Service	04/01/2022	SLL	Review email from Jonathan Marks regarding deposition preparation.	0.10	\$300.00	\$30.00



Service	04/01/2022	SLL	Review photographs taken/submitted by Van Dorn.	2.20	\$300.00	\$660.00
Service	04/01/2022	SLL	Review report of Van Dorn.	1.10	\$300.00	\$330.00
Service	04/01/2022	SLL	Prepare summary of meeting with Amy Lanier	0.50	\$300.00	\$150.00
Service	04/01/2022	RBM	Review report of Defendant's expert Van Dorn	1.80	\$350.00	\$630.00
Service	04/02/2022	SLL	Prepare for depositions of Sharon Arnold and Jacqueline Draper with review of file, preparation of outline	4.00	\$300.00	\$1,200.00
Service	04/03/2022	RBM	Prepare for Jacqueline Draper deposition	6.80	\$350.00	\$2,380.00
Service	04/04/2022	SLL	Prepare exhibits to be used in depositions of Sharon Arnold and Jacqueline Draper.	0.80	\$300.00	\$240.00
Service	04/04/2022	RBM	Depose Sharon Arnold	6.80	\$350.00	\$2,380.00
Service	04/04/2022	DLH	Upload exhibits for deposition of Sharon Arnold	0.50	\$100.00	\$50.00
Service	04/04/2022	SLL	Attend deposition of Sharon Arnold	6.50	\$300.00	\$1,950.00
Service	04/04/2022	SLL	Review prior deposition of Jacqueline Draper in Lewis case to assist with deposition in this case	2.50	\$300.00	\$750.00
Service	04/04/2022	RBM	Finalize preparation for Jacqueline Draper's deposition	3.30	\$350.00	\$1,155.00
Service	04/05/2022	RBM	Begin depo of Jaqueline Draper	5.70	\$350.00	\$1,995.00
Service	04/05/2022	SLL	Attend deposition of Jacqueline Draper.	5.70	\$300.00	\$1,710.00
Service	04/05/2022	DLH	Upload exhibits for deposition of Jacqueline Draper	0.50	\$100.00	\$50.00
Service	04/05/2022	SLL	Research cases involving State Farm where Jacqueline Draper may have testified	1.20	\$300.00	\$360.00
Service	04/05/2022	SLL	Prepare email correspondence to Laurie Koller, regarding similar issues in other cases.	0.20	\$300.00	\$60.00
Service	04/05/2022	SLL	Prepare email correspondence to Adam Engel and and Jordyn Cartmell, regarding similar issues in other cases.	0.20	\$300.00	\$60.00
Service	04/05/2022	SLL	Review deposition of Jacqueline Draper from Weides v State Farm	1.00	\$300.00	\$300.00
Service	04/05/2022	SLL	Review deposition of Jacqueline Draper in Taylor v State Farm.	1.50	\$300.00	\$450.00

Service	04/06/2022	SLL	Communicate via telephone with Laurie Koller regarding other State Farm cases.	0.40	\$300.00	\$120.00
Service	04/06/2022	ADP	Contacted multiple attorneys for the purpose of obtaining deposition testimony of Derek VanDorn.	0.90	\$300.00	\$270.00
Service	04/06/2022	ADP	Reviewed email correspondence from Adam Engel re: expert deposition.	0.20	\$300.00	\$60.00
Service	04/07/2022	ADP	Reviewed and responded to email correspondence from Drew Houghton re: deposition testimony from Derek VanDorn .	0.30	\$300.00	\$90.00
Service	04/11/2022	SLL	Review and analyze 2012 claim file produced by State Farm.	3.80	\$300.00	\$1,140.00
Service	04/11/2022	RBM	Review 2012 claim file pictures and compare to current claim re: Resetting Draper and other timing issues	2.70	\$350.00	\$945.00
Service	04/11/2022	SLL	Strategy meeting with Brad Miller with review of pipe jacks difference from 2012 to 2021 claim files	0.50	\$300.00	\$150.00
Service	04/11/2022	SLL	Communicate via telephone with Paula Williams and Lance Leffel regarding depositions and extension of deadlines.	0.30	\$300.00	\$90.00
Service	04/11/2022	SLL	Prepare email correspondence to Paula Williams and Lance Leffel regarding summary of call and depositions, unopposed motion to extend	0.20	\$300.00	\$60.00
Service	04/11/2022	SLL	Prepare Unopposed Motion to Extend Deadlines and proposed Order re: same	1.80	\$300.00	\$540.00
Service	04/13/2022	SLL	Prepare 3 emails to Gary Bates regarding deposition review of Thomas, Gary, and Marian's depositions.	0.30	\$300.00	\$90.00
Service	04/13/2022	SLL	Review State Farm's response to Motion for Extension.	0.90	\$300.00	\$270.00
Service	04/13/2022	SLL	Review notice of subpoena to Amy Lanier	0.10	\$300.00	\$30.00
Service	04/13/2022	SLL	Review notice of subpoena to Corbin Swain	0.10	\$300.00	\$30.00
Service	04/13/2022	SLL	Review notice of subpoena to Stephanie Lewis	0.10	\$300.00	\$30.00
Service	04/13/2022	SLL	Review notice of subpoena to Michael Lewis	0.10	\$300.00	\$30.00
Service	04/13/2022	SLL	Review and respond to Lance Leffel's email regarding deposition of Jonathan Marks	0.30	\$300.00	\$90.00
Service	04/14/2022	SLL	Communicate via telephone with Lance	0.20	\$300.00	\$60.00

Leffel regarding depositions						
Service	04/14/2022	SLL	Prepare email to Jonathan Marks regarding his deposition.	0.20	\$300.00	\$60.00
Service	04/14/2022	SLL	Communicate via telephone with Lance Leffel about response to Motion for Extension and withdrawing notices, subpoenas.	0.30	\$300.00	\$90.00
Service	04/14/2022	SLL	Review and analyze State Farm final witness list	0.80	\$300.00	\$240.00
Service	04/14/2022	SLL	Review and analyze State Farm final exhibit list	1.10	\$300.00	\$330.00
Service	04/14/2022	SLL	Review State Farm's objections to our exhibit list	0.60	\$300.00	\$180.00
Service	04/18/2022	SLL	Review email from Marian Bates regarding reviewing deposition, bruxism due to stress	0.20	\$300.00	\$60.00
Service	04/18/2022	SLL	Review Order from the Court granting our Motion to Extend.	0.30	\$300.00	\$90.00
Service	04/18/2022	SLL	Review amended Scheduling Order.	0.60	\$300.00	\$180.00
Service	04/18/2022	SLL	Prepare email correspondence to Marian Bates regarding getting something from dentist regarding bruxism	0.20	\$300.00	\$60.00
Service	04/19/2022	SLL	Inbound call from Jonathan Marks regarding subpoena of Amy Lanier	0.30	\$300.00	\$90.00
Service	04/21/2022	SLL	Review email from Gary Bates regarding errata to deposition and prepare errata with his changes.	0.30	\$300.00	\$90.00
Service	04/21/2022	SLL	Communicate via telephone with Gary Bates regarding need for executed jurat.	0.20	\$300.00	\$60.00
Service	04/21/2022	SLL	Prepare email correspondence to Gary Bates regarding changes on errata.	0.20	\$300.00	\$60.00
Service	04/21/2022	SLL	Inbound call from Amy Lanier regarding deposition subpoena	0.20	\$300.00	\$60.00
Service	04/21/2022	SLL	Prepare email to Lance Leffel and Paula Williams regarding depositions and withdrawal of subpoenas.	0.20	\$300.00	\$60.00
Service	04/21/2022	SLL	Review email from Paula Williams confirming withdrawal of subpoenas.	0.10	\$300.00	\$30.00
Service	04/21/2022	SLL	Prepare email to Gary Bates regarding Van Dorn report.	0.20	\$300.00	\$60.00
Service	04/22/2022	SLL	Review and analyze email from Marian	0.20	\$300.00	\$60.00

Bates with attached Jurat.						
Service	04/22/2022	SLL	Review and analyze email from Marian Bates regarding comments on Van Dorn report.	0.30	\$300.00	\$90.00
Service	04/27/2022	RBM	Review prior claim file summaries	4.80	\$350.00	\$1,680.00
Service	04/27/2022	SLL	Strategy meeting Brad Miller, Logan Johnson and Jami Antonisse regarding additional discovery, court ordered deadlines.	0.80	\$300.00	\$240.00
Service	04/28/2022	DLH	Download Other Similar State Farm Claims produced	0.20	\$100.00	\$20.00
Service	04/28/2022	JRA	Research re: defense expert Derek VanDorn	0.50	\$350.00	\$175.00
Service	04/28/2022	CLJ	Begin review of other State Farm claim files to see what the reasoning was for denial in similar cases	5.00	\$300.00	\$1,500.00
Service	04/29/2022	CLJ	Continue review of other State Farm claim files to see what the reasoning was for SF's denial in similar cases	5.00	\$300.00	\$1,500.00
Service	05/02/2022	CLJ	Continue review of other State Farm claim files to see what SF's reasoning was for SF's denial in similar cases	3.50	\$300.00	\$1,050.00
Service	05/03/2022	ADP	Researched extent that a non-retained expert witness can form an opinion and testify to information obtained during litigation.	3.10	\$300.00	\$930.00
Service	05/03/2022	CLJ	Continue review of other State Farm claim files to see what SF's reasoning was for SF's denial in similar cases	2.50	\$300.00	\$750.00
Service	05/03/2022	SLL	Email communications with Paula Williams regarding depositions, concluding Draper deposition, Amy Lanier, Jonathan Marks, Lewises, VanDorn	0.30	\$300.00	\$90.00
Service	05/04/2022	ADP	Finished research regarding what a non-retained expert can review and speak to in their testimony and communicate findings to Shawna Landeros in office meeting	4.50	\$300.00	\$1,350.00
Service	05/04/2022	SLL	Review email from Paula Williams regarding depositions, Draper second half confirmed	0.10	\$300.00	\$30.00
Service	05/04/2022	SLL	Communicate via telephone with Joe Lewis regarding deposition and preparation.	0.30	\$300.00	\$90.00
Service	05/04/2022	SLL	Email communications with Paula Williams	0.30	\$300.00	\$90.00

regarding deposition of Joe Lewis.						
Service	05/04/2022	DLH	Review letters from Instascript, no jurat or errata for Thomas or Marian Bates	0.20	\$100.00	\$20.00
Service	05/05/2022	CLJ	Review document production to analyze why SF denied similar insurance claims	2.40	\$300.00	\$720.00
Service	05/11/2022	SLL	Email communications with Paula Williams regarding depositions, withdrawal of Stephanie Lewis and Corbin Swain, depositions of Marks, Joe Lewis, and Lanier	0.30	\$300.00	\$90.00
Service	05/11/2022	SLL	Prepare email correspondence to Jonathan Marks regarding deposition	0.20	\$300.00	\$60.00
Service	05/11/2022	SLL	Prepare exhibits to Jacqueline Draper's deposition, part two.	0.80	\$300.00	\$240.00
Service	05/12/2022	SLL	Email communications with Paula Williams regarding depositions of Lanier, VanDorn, Marks, and Joe Lewis	0.30	\$300.00	\$90.00
Service	05/12/2022	SLL	Prepare email correspondence to Jonathan Marks regarding 2012 claim file, pipe jack comparison	0.30	\$300.00	\$90.00
Service	05/13/2022	RBM	Prepare for remainder of Drapers deposition	2.60	\$350.00	\$910.00
Service	05/13/2022	SLL	Review supplemental discovery responses from State Farm.	0.70	\$300.00	\$210.00
Service	05/13/2022	SLL	Review April 5 deposition of Jacqueline Draper to prepare for upcoming deposition and prepare depo outline for part two of deposition.	2.20	\$300.00	\$660.00
Service	05/13/2022	SLL	Communicate via telephone with Amy Lanier regarding deposition.	0.30	\$300.00	\$90.00
Service	05/13/2022	SLL	Prepare email to Amy Lanier regarding deposition preparation meeting	0.20	\$300.00	\$60.00
Service	05/13/2022	SLL	Prepare email correspondence to Joe Lewis regarding deposition and deposition preparation.	0.20	\$300.00	\$60.00
Service	05/13/2022	SLL	Review and analyze (begin) review of Team Draper files (bates 489 - 596), highlighted portions from Chase Johnson	2.10	\$300.00	\$630.00
Service	05/13/2022	DLH	Review correspondence from Instascript, no jurat or errata for Tresa Dunnican Jacome.	0.10	\$100.00	\$10.00
Service	05/15/2022	RBM	Continued depo prep for Draper	2.20	\$350.00	\$770.00



Service	05/16/2022	RBM	Complete Draper's depo	4.50	\$350.00	\$1,575.00
Service	05/16/2022	SLL	Review and analyze Team Draper claim files (Bates 597 - 736), highlighted portions from Chase Johnson	2.50	\$300.00	\$750.00
Service	05/16/2022	CLJ	Review and summarize SF's document production re claim files 6-15 re claims made from same/similar weather events	7.80	\$300.00	\$2,340.00
Service	05/16/2022	SLL	Attend deposition of Jacqueline Draper, part 2.	4.50	\$300.00	\$1,350.00
Service	05/16/2022	SLL	Communications with Amy Lanier regarding deposition preparation	0.20	\$300.00	\$60.00
Service	05/17/2022	CLJ	Review and summarize SF's document production re claim files 16-25 re claims made from same/similar weather events	7.20	\$300.00	\$2,160.00
Service	05/18/2022	CLJ	Review and summarize SF's document production re claim files 26-35 re claims made from same/similar weather events	6.80	\$300.00	\$2,040.00
Service	05/19/2022	CLJ	Review and summarize SF's document production re claim files 36-50 re claims made from same/similar weather events	7.00	\$300.00	\$2,100.00
Service	05/20/2022	CLJ	Review and summarize SF's document production re claim files 51-70 re claims made from same/similar weather events	9.00	\$300.00	\$2,700.00
Service	06/03/2022	SLL	Communicate via telephone with Amy Lanier regarding deposition preparation.	0.20	\$300.00	\$60.00
Service	06/03/2022	SLL	Review subpoena to Jonathan Marks.	0.30	\$300.00	\$90.00
Service	06/03/2022	SLL	Prepare email to Jonathan Marks regarding subpoena.	0.20	\$300.00	\$60.00
Service	06/03/2022	SLL	Inbound call from Jonathan Marks regarding deposition and deposition preparation, subpoena	0.20	\$300.00	\$60.00
Service	06/03/2022	SLL	Review subpoena to Joe Lewis	0.30	\$300.00	\$90.00
Service	06/03/2022	SLL	Communicate via telephone with Joe Lewis regarding deposition and deposition preparation, subpoena	0.30	\$300.00	\$90.00
Service	06/03/2022	SLL	Review subpoena to Amy Lanier	0.30	\$300.00	\$90.00
Service	06/03/2022	DLH	Review letter from Instascript, no jurat or errata for Draper	0.10	\$100.00	\$10.00
Service	06/06/2022	SLL	Communicate via telephone with Amy Lanier regarding subpoena	0.20	\$300.00	\$60.00

Service	06/06/2022	RBM	Prepare for trial witness meetings	2.20	\$350.00	\$770.00
Service	06/07/2022	RBM	Meet with Amy Lanier	2.20	\$350.00	\$770.00
Service	06/07/2022	SLL	Plan and prepare for meeting with Amy Lanier by reviewing summary of our discussions	0.40	\$300.00	\$120.00
Service	06/07/2022	SLL	Plan and prepare for meeting with Jonathan Marks by reviewing references to him in depositions of Gary Bates and Marian Bates, Aegis response to subpoena, estimate, email and text correspondence.	2.80	\$300.00	\$840.00
Service	06/07/2022	SLL	Attend deposition prep meeting of Amy Lanier.	2.20	\$300.00	\$660.00
Service	06/07/2022	SLL	Attend deposition prep meeting of Jonathan Marks.	2.80	\$300.00	\$840.00
Service	06/07/2022	RBM	Meet with Jonathon Marks	2.80	\$350.00	\$980.00
Service	06/09/2022	SLL	Review email from Allyson Shumaker regarding service of subpoenas, whether we would accept service for Marks	0.10	\$300.00	\$30.00
Service	06/09/2022	SLL	Review email from Allyson Shumaker regarding service of Marks, whether we would accept service for Lanier and Joe Lewis	0.10	\$300.00	\$30.00
Service	06/09/2022	SLL	Prepare email correspondence tp Allyson Shumaker regarding objection to privileged agreement between Lewis and firm.	0.20	\$300.00	\$60.00
Service	06/09/2022	SLL	Review email from Paula Williams regarding agreement to withdraw #10 in subpoena regarding contract	0.10	\$300.00	\$30.00
Service	06/09/2022	SLL	Communicate via telephone with Joe Lewis regarding subpoena, whether we may accept service, he agrees	0.20	\$300.00	\$60.00
Service	06/09/2022	SLL	Communicate via telephone with Amy Lanier regarding subpoena, she agrees to our acceptance of service	0.20	\$300.00	\$60.00
Service	06/09/2022	SLL	Prepare email correspondence to Paula Williams regarding will agree to accept service for Amy Lanier and Joe Lewis.	0.20	\$300.00	\$60.00
Service	06/09/2022	SLL	Prepare email to Joe Lewis regarding subpoena, need to bring responsive documents to deposition, except contract which has been withdrawn and is privileged	0.20	\$300.00	\$60.00
Service	06/09/2022	SLL	Prepare email to Amy Lanier regarding subpoena, need to bring responsive	0.20	\$300.00	\$60.00

			documents to deposition			
Service	06/10/2022	SLL	Prepare status update to the Bates's regarding depositions of Draper, Jacome, Mendoza, Arnold, and upcoming depositions.	1.50	\$300.00	\$450.00
Service	06/10/2022	SLL	Review new subpoenas from Sheri Howard to Amy Lanier and Michael Lewis and compare to notice of subpoenas, they are the same	0.30	\$300.00	\$90.00
Service	06/13/2022	SLL	Review emails from Gary Bates regarding Derek Van Dorn, he located other case, Wagner v State Farm	0.20	\$300.00	\$60.00
Service	06/13/2022	SLL	Perform research regarding Wagner v State Farm and use of VanDorn	0.60	\$300.00	\$180.00
Service	06/14/2022	DLH	Download and identify Defendant supplemental production	1.00	\$100.00	\$100.00
Service	06/15/2022	SLL	Inbound call from Joe Lewis regarding deposition and subpoenaed documents.	0.30	\$300.00	\$90.00
Service	06/15/2022	SLL	Review email correspondence from Paula Williams regarding supplemental production, claim file with ongoing activity	0.30	\$300.00	\$90.00
Service	06/15/2022	SLL	Review supplemental discovery response from State Farm regarding 72 files denied instead of 71	0.40	\$300.00	\$120.00
Service	06/15/2022	SLL	Continue review of Team Draper claim files, bates 737 - 951, highlighted portions from Chase Johnson	2.80	\$300.00	\$840.00
Service	06/16/2022	SLL	Review and respond to email from Marian Bates regarding deposition of Draper	0.20	\$300.00	\$60.00
Service	06/16/2022	SLL	Review file for exhibits listed in State Farm's exhibit list	1.60	\$300.00	\$480.00
Service	06/16/2022	SLL	Prepare objections to State Farm's exhibit list	1.60	\$300.00	\$480.00
Service	06/17/2022	DLH	Filed Objection to Dft Exhibit List	0.20	\$100.00	\$20.00
Service	06/17/2022	SLL	Review and analyze text messages and emails from Joe Lewis in response to subpoena	0.70	\$300.00	\$210.00
Service	06/20/2022	RBM	Prepare for Van Dorn deposition	3.50	\$350.00	\$1,225.00
Service	06/20/2022	SLL	Plan and prepare for Derek Van Dorn's deposition by reviewing report, photographs, comparison with claim file and preparing outline	4.00	\$300.00	\$1,200.00

Service	06/21/2022	SLL	Prepare State Farm corporate representative notice of deposition with topics.	1.50	\$300.00	\$450.00
Service	06/22/2022	SLL	Review State Farm training videos for use as to VanDorn opinions and Marks opinions	1.70	\$300.00	\$510.00
Service	06/22/2022	SLL	Review various documentation from Amy Lanier in response to subpoena to her	0.90	\$300.00	\$270.00
Service	06/23/2022	SLL	Attend deposition of Jonathan Marks.	3.00	\$300.00	\$900.00
Service	06/23/2022	RBM	Meet with Joe Lewis (no charge)	2.00	\$0.00	\$0.00
Service	06/23/2022	SLL	Attend post-deposition meeting with Gary Bates and Mariann Bates regarding strategy moving forward	0.60	\$300.00	\$180.00
Service	06/23/2022	SLL	Attend deposition preparation session with Joe Lewis.	2.00	\$300.00	\$600.00
Service	06/23/2022	SLL	Communicate via telephone with Amy Lanier regarding tomorrow's deposition, received all documents she sent responsive to subpoena	0.20	\$300.00	\$60.00
Service	06/24/2022	SLL	Attend deposition of Amy Lanier	4.80	\$300.00	\$1,440.00
Service	06/24/2022	SLL	Attend deposition of Joe Lewis.	1.00	\$300.00	\$300.00
Service	06/25/2022	RBM	Continued preparation for Van Dorn Deposition	3.50	\$350.00	\$1,225.00
Service	06/25/2022	SLL	Prepare revisions to Corporate representative notice for State Farm	0.40	\$300.00	\$120.00
Service	06/25/2022	SLL	Prepare email correspondence to Paula Williams and Lance Leffel regarding corporate representative notice of deposition.	0.20	\$300.00	\$60.00
Service	06/25/2022	SLL	Prepare final outline for Van Dorn deposition.	1.10	\$300.00	\$330.00
Service	06/26/2022	RBM	Continued preparation for Van Dorn Deposition	3.50	\$350.00	\$1,225.00
Service	06/27/2022	RBM	Continued preparation for Van Dorn Deposition	4.50	\$350.00	\$1,575.00
Service	06/27/2022	JRA	Legal research re: deadline to supplement expert report, local rule re: reasonable notice for depositions	0.40	\$350.00	\$140.00
Service	06/28/2022	RBM	Depose SF Expert Derek VanDorn	8.20	\$350.00	\$2,870.00
Service	07/03/2022	SLL	Review Team Draper claim files, bates stamp 961 - 1278, highlighted portions from	2.40	\$300.00	\$720.00

Chase Johnson						
Service	07/04/2022	SLL	Review and analyze Team Draper files, bates stamped 1279 to 1505, highlighted portions from Chase Johnson	2.90	\$300.00	\$870.00
Service	07/05/2022	SLL	Review and analyze Team Draper files, bates stamped 1506 to 1959, highlighted portions from Chase Johnson	3.80	\$300.00	\$1,140.00
Service	07/06/2022	SLL	Review email from Taylor Peshehonoff regarding Jonathan Marks supplementation.	0.20	\$300.00	\$60.00
Service	07/06/2022	SLL	Review and analyze supplemental report of VanDorn.	1.20	\$300.00	\$360.00
Service	07/06/2022	SLL	Review and analyze deposition of VanDorn to prepare for Daubert Motion.	3.20	\$300.00	\$960.00
Service	07/06/2022	SLL	Prepare email correspondence to Jonathan Marks regarding review of deposition and supplementing document production.	0.20	\$300.00	\$60.00
Service	07/06/2022	SLL	Strategy meeting with Brad Miller regarding VanDorn deposition and strategy for exclusion.	1.00	\$300.00	\$300.00
Service	07/06/2022	SLL	Begin Daubert Motion on VanDorn.	2.90	\$300.00	\$870.00
Service	07/06/2022	SLL	Review EOA for Taylor Peshehonoff	0.10	\$300.00	\$30.00
Service	07/07/2022	SLL	Communicate via telephone with Paula Williams regarding corporate representative deposition.	0.20	\$300.00	\$60.00
Service	07/07/2022	SLL	Prepare email to Gary and Marian Bates regarding depositions of VanDorn and Marks, plan to file Motion to Exclude VanDorn.	0.20	\$300.00	\$60.00
Service	07/07/2022	SLL	Review and respond to email from Marian Bates with questions regarding motion to exclude VanDorn.	0.20	\$300.00	\$60.00
Service	07/07/2022	SLL	Prepare (continue) Daubert motion on VanDorn.	2.40	\$300.00	\$720.00
Service	07/08/2022	SLL	Review Motion to Withdraw and Order granting Motion to Withdraw on Shumaker.	0.20	\$300.00	\$60.00
Service	07/08/2022	SLL	Prepare (finalize) Motion to Exclude VanDorn and exhibits.	8.50	\$300.00	\$2,550.00
Service	07/11/2022	SLL	Prepare email correspondence to Marian and Gary Bates regarding depositions of Michael Lewis and Amy Lanier.	0.20	\$300.00	\$60.00



Service	07/11/2022	SLL	Review email from Taylor Peshehonoff regarding supplementation from Jonathan Marks.	0.10	\$300.00	\$30.00
Service	07/11/2022	SLL	Review email from Jonathan Marks regarding need for more specificity as to what documents were cut off in order to produce	0.10	\$300.00	\$30.00
Service	07/12/2022	SLL	Review State Farm's Motion for Partial Summary Judgment.	2.10	\$300.00	\$630.00
Service	07/12/2022	SLL	Prepare email correspondence to Marian and Gary Bates regarding Motion for Summary Judgment and mediation.	0.20	\$300.00	\$60.00
Service	07/12/2022	SLL	Prepare email correspondence to Taylor Peshehonoff regarding request for more specificity on Jonathan Marks records.	0.20	\$300.00	\$60.00
Service	07/12/2022	SLL	Review email from Lance Leffel regarding records sought and attached JobNimbus report	0.30	\$300.00	\$90.00
Service	07/12/2022	SLL	Communicate via telephone with Paula Williams regarding corporate representative deposition and mediation.	0.20	\$300.00	\$60.00
Service	07/12/2022	SLL	Review email from Marian Bates regarding State Farm's Motion for Partial Summary Judgment	0.20	\$300.00	\$60.00
Service	07/14/2022	SLL	Review lengthy email correspondence from Paula Williams regarding corporate representative deposition	0.30	\$300.00	\$90.00
Service	07/18/2022	SLL	Review 22 emails from Jonathan Marks in response to Subpoena duces tecum.	1.20	\$300.00	\$360.00
Service	07/18/2022	RBM	Review and revise demand for Corp Rep depo	0.70	\$350.00	\$245.00
Service	07/18/2022	SLL	Attend strategy meeting with Brad Miller regarding mediation, corporate representative deposition.	0.70	\$300.00	\$210.00
Service	07/18/2022	SLL	Prepare email correspondence to Paula Williams regarding no agreement as to terms of corporate representative deposition and mediation.	0.20	\$300.00	\$60.00
Service	07/19/2022	SLL	Review depositions of Jacome, Draper Vol 1 and 2, Arnold for additional material facts in response to State Farm's Motion for Summary Judgment.	7.50	\$300.00	\$2,250.00
Service	07/21/2022	SLL	Review email from Paula Williams regarding mediation.	0.10	\$300.00	\$30.00

Service	07/21/2022	DLH	Prepare email correspondence to Monica with DRC regarding mediation with Duncan	0.20	\$100.00	\$20.00
Service	07/26/2022	SLL	Review depositions of Gary Bates, Amy Lanier, Marks, Mendoza, claim file summary, to prepare additional material facts in response to Motion for Partial Summary Judgment.	6.60	\$300.00	\$1,980.00
Service	07/26/2022	JRA	Finish draft of Response to Motion for Summary Judgment	2.00	\$350.00	\$700.00
Service	07/27/2022	SLL	Prepare responses to State Farm's undisputed material facts, with references to depositions and file materials.	8.00	\$300.00	\$2,400.00
Service	07/27/2022	SLL	Communicate via telephone with Gary Bates regarding mediation.	0.20	\$300.00	\$60.00
Service	07/27/2022	SLL	Prepare email correspondence to Paula Williams regarding mediation, fillable form completed.	0.20	\$300.00	\$60.00
Service	07/27/2022	SLL	Prepare email correspondence to Monica with DRC regarding mediation with Mike Duncan	0.30	\$300.00	\$90.00
Service	07/27/2022	SLL	Review email from Paula Williams, completed fillable form from DRC is agreed-to	0.10	\$300.00	\$30.00
Service	07/27/2022	JRA	Review and revise facts section to Plaintiff's Response to Motion for Partial Summary Judgment; shepardize citations to ensure cases are good law; continue preparation of argument and authority	8.00	\$350.00	\$2,800.00
Service	07/28/2022	JRA	Finish draft of Response to Motion for Summary Judgment	6.40	\$350.00	\$2,240.00
Service	07/29/2022	SLL	Finalize Response to State Farm's MPSJ and prepare exhibits.	4.50	\$300.00	\$1,350.00
Service	08/02/2022	SLL	Review and respond to email from Carol Ditta, Judicial Assistant to Judge Dishman regarding courtesy copy	0.20	\$300.00	\$60.00
Service	08/02/2022	SLL	Review and respond to email from Monica with DRC regarding request for counsel agreement as to terms before mediation confirmation letter will be sent	0.30	\$300.00	\$90.00
Service	08/02/2022	SLL	Review mediation confirmation letter from DRC	0.20	\$300.00	\$60.00
Service	08/02/2022	SLL	Prepare email correspondence to Gary Bates regarding mediation.	0.20	\$300.00	\$60.00

Service	08/04/2022	SLL	Review and analyze State Farm's response to our Motion to Exclude Van Dorn.	1.50	\$300.00	\$450.00
Service	08/04/2022	SLL	Review and respond to email from Gary and Marian Bates regarding mediation, request for costs to date	0.20	\$300.00	\$60.00
Service	08/08/2022	SLL	Review State Farm's reply in support of their Motion for Partial Summary Judgment.	1.50	\$300.00	\$450.00
Service	08/08/2022	SLL	Prepare Plaintiff's mediation statement.	7.60	\$300.00	\$2,280.00
Service	08/09/2022	SLL	Prepare email correspondence to Mike Duncan regarding mediation statement.	0.20	\$300.00	\$60.00
Service	08/09/2022	JRA	Review and revise mediation statement.	0.50	\$350.00	\$175.00
Service	08/11/2022	SLL	Review and respond to email from Jonathan Marks regarding jurat and errata.	0.20	\$300.00	\$60.00
Service	08/11/2022	SLL	Review email from Mike Duncan regarding upcoming mediation	0.10	\$300.00	\$30.00
Service	08/11/2022	SLL	Review letter from Instascript, no jurat or errata for Jonathan Marks	0.10	\$300.00	\$30.00
Service	08/12/2022	SLL	Communicate via telephone with Jonathan Marks regarding percentage of denials involving State Farm.	0.50	\$300.00	\$150.00
Service	08/12/2022	SLL	In-firm meeting with Brad Miller and Logan Johnson regarding mediation strategy and trial strategy.	0.50	\$300.00	\$150.00
Service	08/15/2022	SLL	Attend mediation.	4.50	\$300.00	\$1,350.00
Service	08/15/2022	RBM	Prepare for mediation	3.50	\$350.00	\$1,225.00
Service	08/15/2022	SLL	Prepare email correspondence to Bates regarding response to Motion for Partial Summary Judgment	0.30	\$300.00	\$90.00
Service	08/15/2022	SLL	Review ADR report filed by Mike Duncan	0.20	\$300.00	\$60.00
Service	08/15/2022	RBM	Attend mediation	4.50	\$350.00	\$1,575.00
Service	08/16/2022	SLL	Prepare email correspondence to Gary Bates regarding State Farm's reply in support of its Motion for Partial Summary Judgment.	0.20	\$300.00	\$60.00
Service	08/22/2022	SLL	Review Order setting hearing on Motion for Partial Summary Judgment.	0.10	\$300.00	\$30.00
Service	08/22/2022	SLL	Review rules cited by Judge Dishman in Order	0.30	\$300.00	\$90.00
Service	08/28/2022	RBM	Trial preparation re: Exhibits	3.50	\$350.00	\$1,225.00

Service	08/29/2022	RBM	Trial preparation re: Exhibits	2.00	\$350.00	\$700.00
Service	08/29/2022	SLL	in-firm meeting with Brad Miller and Jami Antonisse regarding trial preparations, hearing on Motion for Summary Judgment	1.00	\$300.00	\$300.00
Service	08/31/2022	SLL	Review and compare estimates from claim file versus one received post litigation.	0.50	\$300.00	\$150.00
Service	08/31/2022	RBM	Lengthy email to client regarding trial and settlement issues	1.50	\$350.00	\$525.00
Service	08/31/2022	SLL	Review correspondence from Paula Williams regarding check and new estimate.	0.50	\$300.00	\$150.00
Service	08/31/2022	SLL	Prepare email correspondence to Gary Bates regarding check and hearing on Motion for Partial Summary Judgment	0.20	\$300.00	\$60.00
Service	09/01/2022	SLL	Review and analyze Civil Trial Docket and Pretrial Conference docket	0.30	\$300.00	\$90.00
Service	09/08/2022	SLL	Review email from Nyssa Vasquez regarding telephone conference with Judge Dishman.	0.10	\$300.00	\$30.00
Service	09/08/2022	SLL	Prepare email correspondence to Lance Leffel and Paula Williams regarding Initial Disclosures	0.20	\$300.00	\$60.00
Service	09/08/2022	SLL	Review email from Lance Leffel regarding conference with Judge Dishman.	0.10	\$300.00	\$30.00
Service	09/08/2022	SLL	Prepare email correspondence to Nyssa Vasquez regarding conference with Judge Dishman.	0.10	\$300.00	\$30.00
Service	09/08/2022	SLL	Communicate via telephone with Jonathan Marks regarding trial.	0.20	\$300.00	\$60.00
Service	09/08/2022	SLL	Communicate via telephone with Amy Lanier regarding trial.	0.20	\$300.00	\$60.00
Service	09/08/2022	SLL	Prepare email correspondence to Lance Leffel and Paula Williams regarding deposition designations, who they intend to call live at trial	0.20	\$300.00	\$60.00
Service	09/15/2022	SLL	Prepare email to Lance Leffel and Paula Williams regarding deposition designations.	0.20	\$300.00	\$60.00
Service	09/15/2022	SLL	Review email from Paula Williams regarding determining who will be coming live at trial, to be determined	0.10	\$300.00	\$30.00
Service	09/19/2022	RBM	Begin Deposition Designation Preparation	3.50	\$350.00	\$1,225.00

Service	09/20/2022	JRA	Research re: Judge Dishman rulings and memo to file re: same	1.00	\$350.00	\$350.00
Service	09/20/2022	SLL	Attend zoom hearing regarding Motion for Partial Summary Judgment with Brad Miller	0.60	\$300.00	\$180.00
Service	09/20/2022	RBM	Attend zoom hearing regarding Motion for Partial Summary Judgment with Shawna Landeros	0.60	\$350.00	\$210.00
Service	09/20/2022	SLL	Communicate via telephone with Gary Bates regarding outcome of hearing, upcoming trial.	0.30	\$300.00	\$90.00
Service	09/20/2022	SLL	Review Minute Entry denying Motion for Partial summary judgment	0.10	\$300.00	\$30.00
Service	09/20/2022	SLL	In-firm strategy meeting with Brad Miller and Jami Antonisse regarding trial preparation	2.20	\$300.00	\$660.00
Service	09/20/2022	RBM	Trial preparation based on court ruling	5.50	\$350.00	\$1,925.00
Service	09/21/2022	RBM	Trial preparation - Exhibit analysis for cross examination	8.90	\$350.00	\$3,115.00
Service	09/22/2022	RBM	Trial preparation - Exhibit analysis for cross examination	9.50	\$350.00	\$3,325.00
Service	09/22/2022	JRA	Review memo re: non-retained experts; perform additional legal research re: qualifying roofers as same; communicate findings to Shawna Landeros	4.80	\$350.00	\$1,680.00
Service	09/23/2022	SLL	Review Scheduling Order for upcoming trial deadlines.	0.30	\$300.00	\$90.00
Service	09/23/2022	SLL	Prepare Jury Instructions.	5.50	\$300.00	\$1,650.00
Service	09/26/2022	SLL	Review research re: Judge Dishman; further review of case where voir dire completed but settlement due to COVID	0.80	\$300.00	\$240.00
Service	09/26/2022	SLL	Prepare Plaintiff's portion of Final Pretrial Report.	7.50	\$300.00	\$2,250.00
Service	09/27/2022	SLL	Review proposed Motion from Paula Williams regarding moving trial date.	0.40	\$300.00	\$120.00
Service	09/27/2022	JRA	Review and revise jury instructions, voir dire, and other trial preparations	1.00	\$350.00	\$350.00
Service	09/27/2022	RBM	Trial Preparation - Arnold testimony - deposition highlighting	5.80	\$350.00	\$2,030.00
Service	09/27/2022	SLL	Prepare revisions to jury instructions.	0.60	\$300.00	\$180.00
Service	09/27/2022	SLL	Prepare proposed voir dire.	2.20	\$300.00	\$660.00

Service	09/27/2022	SLL	Prepare email correspondence to Defendant State Farm counsel regarding proposed jury instructions.	0.20	\$300.00	\$60.00
Service	09/29/2022	SLL	Prepare revisions to Final Pretrial Report with regard to exhibits to streamline with exhibits used at depositions	2.50	\$300.00	\$750.00
Service	09/29/2022	JRA	Review draft Pretrial Conference Order	0.30	\$350.00	\$105.00
Service	09/29/2022	SLL	Communicate via telephone with Lance Leffel, Paula Williams and Brad Miller regarding proposed extension of trial setting.	0.50	\$300.00	\$150.00
Service	09/30/2022	RBM	Trial Preparation - Draper testimony	8.20	\$350.00	\$2,870.00
Service	10/03/2022	JRA	Review and revise Response to Motion to Extend Trial Date	0.50	\$350.00	\$175.00
Service	10/03/2022	RBM	Trial Preparation - Jacome testimony - deposition highlighting	8.50	\$350.00	\$2,975.00
Service	10/03/2022	SLL	Prepare (finalize) pretrial report.	1.40	\$300.00	\$420.00
Service	10/03/2022	SLL	Review email from Paula Williams regarding joint exhibits	0.10	\$300.00	\$30.00
Service	10/03/2022	SLL	Prepare email correspondence to Lance Leffel regarding pretrial report, exhibits.	0.20	\$300.00	\$60.00
Service	10/03/2022	SLL	Communicate via telephone with Gary Bates regarding trial, State Farm's motion to extend trial setting.	0.40	\$300.00	\$120.00
Service	10/03/2022	SLL	Review Motion to Extend trial and proposed Order re: same	0.60	\$300.00	\$180.00
Service	10/03/2022	SLL	Review Order regarding telephonic conference on motion for extension of trial setting	0.10	\$300.00	\$30.00
Service	10/03/2022	SLL	Review Order on expedited briefing to respond to Motion for Extension of trial setting	0.10	\$300.00	\$30.00
Service	10/03/2022	SLL	Review email from Nyssa Vasquez regarding telephonic hearing with Judge Dishman	0.10	\$300.00	\$30.00
Service	10/03/2022	SLL	Research as to flights available for Draper to attend trial without modification to trial setting	0.50	\$300.00	\$150.00
Service	10/03/2022	SLL	Prepare response to Motion to Extend Trial setting	3.80	\$300.00	\$1,140.00
Service	10/03/2022	SLL	Attend telephonic hearing regarding Motion	0.20	\$300.00	\$60.00

			to Extend trial with Judge Dishman.			
Service	10/03/2022	SLL	Review case law referenced by Judge Dishman during telephonic conference	0.70	\$300.00	\$210.00
Service	10/04/2022	JRA	Review and analysis of Defendant's proposed agreed motions in limine	0.40	\$350.00	\$140.00
Service	10/04/2022	RBM	Trial Preparation - Van Dorn testimony - deposition highlighting	4.50	\$350.00	\$1,575.00
Service	10/04/2022	SLL	Review Notice of Agreed Motions in limine.	1.00	\$300.00	\$300.00
Service	10/04/2022	SLL	Research case law regarding State Farm's motions in limine.	6.50	\$300.00	\$1,950.00
Service	10/04/2022	SLL	Formulate list of proposed motions in limine based on testimony in case.	1.80	\$300.00	\$540.00
Service	10/04/2022	SLL	Attend meet and confer with Paula Williams and Lance Leffel, ordered by Judge Dishman as to Draper testimony, motions in limine	1.00	\$300.00	\$300.00
Service	10/04/2022	SLL	Prepare email correspondence to Paula Williams and Lance Leffel regarding agreements following meet and confer as to Draper	0.30	\$300.00	\$90.00
Service	10/04/2022	SLL	Review email from Lance Leffel regarding agreement as to results of meet and confer	0.10	\$300.00	\$30.00
Service	10/05/2022	ADP	Researched extent to which bad faith emotional distress damages can apply to a third party.	2.00	\$300.00	\$600.00
Service	10/05/2022	JRA	Begin preparation of Motion in Limine re: Plaintiff's OID complaint and Buzzard issues and other MIL's based on Shawna Landeros input	4.60	\$350.00	\$1,610.00
Service	10/05/2022	SLL	Prepare email correspondence to Lance Leffel regarding revision to and/or language on calling Draper at trial via zoom, since she will need to be available both days	0.20	\$300.00	\$60.00
Service	10/05/2022	SLL	Review and respond to email from Lance Leffel regarding revised language as to Draper testimony	0.20	\$300.00	\$60.00
Service	10/05/2022	SLL	Review proposed supplement to Motion from Paula Williams.	0.70	\$300.00	\$210.00
Service	10/05/2022	SLL	Meet and confer with Paula Williams regarding Motions in limine	1.00	\$300.00	\$300.00
Service	10/05/2022	SLL	Review list of proposed Motions in limine from Paula Williams, with more detail	0.90	\$300.00	\$270.00



			regarding topics.			
Service	10/05/2022	SLL	Prepare email correspondence to Paula Williams regarding agreement as to Joint Motion regarding Draper testimony and safeguards	0.20	\$300.00	\$60.00
Service	10/05/2022	SLL	Prepare email correspondence to Paula Williams regarding agreement as to Motions in limine.	0.20	\$300.00	\$60.00
Service	10/05/2022	SLL	Attend meeting with Brad Miller and Jami Antonisse regarding trial preparations.	1.00	\$300.00	\$300.00
Service	10/05/2022	SLL	Prepare revisions to proposed Voir Dire	0.70	\$300.00	\$210.00
Service	10/06/2022	RBM	Trial Preparation - Thomas Bates testimony - deposition highlighting	2.50	\$350.00	\$875.00
Service	10/06/2022	SLL	Prepare email correspondence to Paula and Lance regarding Pretrial Report, agreed exhibits.	0.20	\$300.00	\$60.00
Service	10/06/2022	SLL	Review email correspondence regarding agreements and no agreements as to certain of Plaintiff's motions in limine	0.30	\$300.00	\$90.00
Service	10/06/2022	SLL	Review returned draft from Taylor Freeman Peshehonoff on Pretrial Report with State Farm's additions but noted they will make further changes	1.30	\$300.00	\$390.00
Service	10/06/2022	SLL	Prepare email correspondence to Lance and Paula and Taylor regarding exhibit exchange.	0.20	\$300.00	\$60.00
Service	10/06/2022	SLL	Review proposed deposition designation of Mendoza and prepare additions.	2.30	\$300.00	\$690.00
Service	10/06/2022	SLL	Review email from Lance as to exhibit exchange.	0.10	\$300.00	\$30.00
Service	10/06/2022	SLL	Prepare revised Notice of Agreed Motions in limine.	2.00	\$300.00	\$600.00
Service	10/06/2022	SLL	Review deposition of Thomas Bates for designations	0.80	\$300.00	\$240.00
Service	10/06/2022	SLL	Review deposition of Sharon Arnold for designations if needed and trial preparation	2.10	\$300.00	\$630.00
Service	10/06/2022	SLL	Review three depositions of Draper for designations if needed and trial preparation	4.20	\$300.00	\$1,260.00
Service	10/06/2022	SLL	Finalize Plaintiff's Motions in Limine	4.50	\$300.00	\$1,350.00
Service	10/07/2022	RBM	Prepare for trial regarding Van Dorn testimony - deposition highlighting	7.50	\$350.00	\$2,625.00

Service	10/07/2022	SLL	Review State Farm's proposed jury instructions	2.20	\$300.00	\$660.00
Service	10/07/2022	SLL	Review State Farm comments on our proposed instructions	2.10	\$300.00	\$630.00
Service	10/07/2022	SLL	Prepare revisions to Notice of Agreed motions in limine	0.80	\$300.00	\$240.00
Service	10/07/2022	SLL	Review email correspondence from Taylor Peshehonoff regarding withdrawal of one of their motions in limine and additional edits to Notice of Agreed motions in limine	0.30	\$300.00	\$90.00
Service	10/07/2022	SLL	Prepare email correspondence to Taylor Peshehonoff regarding approval of revised Notice of Agreed motions in limine	0.10	\$300.00	\$30.00
Service	10/07/2022	SLL	Prepare revisions to Joint Proposed Jury Instructions	1.50	\$300.00	\$450.00
Service	10/07/2022	SLL	Prepare email correspondence to Taylor Peshehonoff regarding revisions to jury instructions and what is agreed and what is not agreed to	0.20	\$300.00	\$60.00
Service	10/07/2022	SLL	Prepare additions to Final Pretrial Report and create separate joint exhibit list, Plaintiff's exhibit list and defendant's exhibit list as ordered	1.10	\$300.00	\$330.00
Service	10/07/2022	SLL	Review correspondence from Taylor Peshehonoff regarding proposed verdict forms	0.30	\$300.00	\$90.00
Service	10/07/2022	SLL	Review proposed Final Pretrial Report from Lance Leffel with revision to statement of the case	0.20	\$300.00	\$60.00
Service	10/07/2022	SLL	Prepare revisions to joint proposed Jury Instructions given non-agreement as to verdict forms	0.30	\$300.00	\$90.00
Service	10/07/2022	SLL	Prepare email correspondence to Taylor Peshehonoff regarding removing certain instructions from joint proposed instructions, 22.6 and 22.7	0.20	\$300.00	\$60.00
Service	10/07/2022	SLL	Prepare Designation of Deposition Testimony for Anthony Mendoza	1.50	\$300.00	\$450.00
Service	10/07/2022	SLL	Review correspondence from Taylor Peshehonoff regarding revisions to Defendant's exhibit list	0.30	\$300.00	\$90.00
Service	10/07/2022	SLL	Prepare Certificate of Conference	0.30	\$300.00	\$90.00
Service	10/07/2022	SLL	Prepare separate supplemental Jury	1.00	\$300.00	\$300.00

Instructions on behalf of Plaintiff						
Service	10/07/2022	SLL	Prepare redlined version of Joint Proposed Instruction to send orders inbox	0.50	\$300.00	\$150.00
Service	10/07/2022	SLL	Prepare redlined version of Plaintiff's supplemental jury instructions to send to orders inbox	0.40	\$300.00	\$120.00
Service	10/07/2022	SLL	Review correspondence from Taylor Peshehonoff regarding Proposed Order on Final Pretrial Report	0.20	\$300.00	\$60.00
Service	10/07/2022	SLL	Prepare email correspondence to Taylor Peshehonoff regarding agreement to send proposed order on Final Pretrial Report	0.10	\$300.00	\$30.00
Service	10/10/2022	RBM	Trial Preparation - Jacome indexing	7.50	\$350.00	\$2,625.00
Service	10/10/2022	SLL	Review file and respond to Brad Miller's questions on Judge Dishman's ruling and Marks' testimony in preparation for trial	1.00	\$300.00	\$300.00
Service	10/11/2022	ADP	Continued researching a third-party's ability to collect damages for emotional distress when they handled the claim but are not the insured.	1.80	\$300.00	\$540.00
Service	10/11/2022	SLL	Review and analyze State Farm's proposed voir dire	1.20	\$300.00	\$360.00
Service	10/11/2022	RBM	Trial Preparation - Draper indexing	6.50	\$350.00	\$2,275.00
Service	10/11/2022	SLL	Review and analyze State Farm's trial brief	2.00	\$300.00	\$600.00
Service	10/11/2022	SLL	Review and analyze State Farm's Motions in limine	2.60	\$300.00	\$780.00
Service	10/11/2022	SLL	Review and analyze additional proposed jury instructions filed by State Farm.	0.60	\$300.00	\$180.00
Service	10/11/2022	SLL	Review certificate of conference filed by State Farm	0.10	\$300.00	\$30.00
Service	10/12/2022	ADP	Finished researching availability of emotional distress damages.	0.50	\$300.00	\$150.00
Service	10/12/2022	SLL	Prepare (begin) trial exhibits	6.50	\$300.00	\$1,950.00
Service	10/12/2022	RBM	Trial Preparation - Arnold indexing	5.50	\$350.00	\$1,925.00
Service	10/12/2022	SLL	Prepare email correspondence to Lance Leffel regarding exchange of trial exhibits and demonstratives	0.20	\$300.00	\$60.00
Service	10/12/2022	SLL	Review email from Lance Leffel regarding exhibit exchange	0.10	\$300.00	\$30.00

Service	10/13/2022	RBM	Trial Preparation - Van Dorn indexing	2.20	\$350.00	\$770.00
Service	10/13/2022	SLL	Review email from Nyssa Vasquez regarding settlement conference	0.10	\$300.00	\$30.00
Service	10/13/2022	SLL	Review email from Lance Leffel, State Farm will participate in judicial settlement conference	0.10	\$300.00	\$30.00
Service	10/13/2022	SLL	Communicate via telephone with Janna McGuire regarding meeting to go over exhibits for trial	0.20	\$300.00	\$60.00
Service	10/13/2022	SLL	Communications regarding obtaining certified copy of State Farm annual statements	0.30	\$300.00	\$90.00
Service	10/13/2022	SLL	Prepare (continue) trial exhibits	3.40	\$300.00	\$1,020.00
Service	10/13/2022	DLH	Review Notice of Filing of Official Transcript of proceedings on September 20 and order same	0.20	\$100.00	\$20.00
Service	10/14/2022	SLL	Review deposition designations of State Farm.	2.20	\$300.00	\$660.00
Service	10/14/2022	DLH	Upload and circulate Plaintiff's Exhibits	0.30	\$100.00	\$30.00
Service	10/14/2022	DLH	Prepare draft Objection to Deposition designations and counter designations - Bates.	0.50	\$100.00	\$50.00
Service	10/14/2022	DLH	Receive and download Defendant designations-Anthony Mendoza	0.20	\$100.00	\$20.00
Service	10/14/2022	DLH	Prepare trial exhibits in final format for review	6.00	\$100.00	\$600.00
Service	10/14/2022	SLL	Prepare objections and counter-designations of deposition testimony	3.10	\$300.00	\$930.00
Service	10/14/2022	SLL	Meeting with Jonathan Marks and Brad Miller for trial prep.	2.60	\$300.00	\$780.00
Service	10/15/2022	RBM	Trial Preparation regarding Exhibit usage in testimony	6.60	\$350.00	\$2,310.00
Service	10/15/2022	SLL	Review of training materials for use at trial with specific time-stamps of relevant material	4.20	\$300.00	\$1,260.00
Service	10/15/2022	SLL	Prepare correspondence to Lance Leffel regarding trial exhibits, obtaining certified copies of annual statement	0.20	\$300.00	\$60.00
Service	10/16/2022	RBM	Trial Preparation regarding Exhibit usage in testimony	2.20	\$350.00	\$770.00

Service	10/17/2022	JRA	Begin preparation of Response to State Farm's Motions in Limine and Response to State Farm's Trial Brief	6.50	\$350.00	\$2,275.00
Service	10/17/2022	RBM	Trial Preparation regarding cross examination of Van Dorn	8.90	\$350.00	\$3,115.00
Service	10/17/2022	SLL	Meeting with Thomas Bates, Gary Bates and Marian Bates for trial prep.	3.50	\$300.00	\$1,050.00
Service	10/17/2022	SLL	Meeting with Janna McGuire and Brad Miller regarding courtroom technology and use of exhibits at trial	2.50	\$300.00	\$750.00
Service	10/17/2022	SLL	Prepare trial subpoena for Tresa Dunnican-Jacome	0.30	\$300.00	\$90.00
Service	10/17/2022	SLL	Prepare trial subpoena for Sharon Arnold	0.30	\$300.00	\$90.00
Service	10/17/2022	SLL	Review Order on settlement conference.	0.20	\$300.00	\$60.00
Service	10/17/2022	SLL	Review Order on Motion for Extension of Trial.	0.30	\$300.00	\$90.00
Service	10/17/2022	SLL	Prepare correspondence to Lance Leffel regarding trial subpoenas	0.20	\$300.00	\$60.00
Service	10/17/2022	SLL	Review deposition of Tresa Dunnican-Jacome to assist in trial preparation, cross-examination	2.60	\$300.00	\$780.00
Service	10/17/2022	RBM	Meet with Janna McGuire and Shawna Landeros re: Exhibits	2.50	\$350.00	\$875.00
Service	10/18/2022	JRA	Continued preparation of Response to State Farm's Motions in Limine, Response to State Farm's Trial Brief	8.00	\$350.00	\$2,800.00
Service	10/18/2022	SLL	Communicate via telephone with Amy Lanier regarding trial prep	0.40	\$300.00	\$120.00
Service	10/18/2022	SLL	Detailed review and comparison of State Farm estimate pre-litigation and post-litigation for all differences	1.40	\$300.00	\$420.00
Service	10/18/2022	SLL	Review and comparison of Accuweather reports from claim file and Aegis file	0.50	\$300.00	\$150.00
Service	10/18/2022	SLL	Review counter-designations of State Farm of Mendoza	2.30	\$300.00	\$690.00
Service	10/18/2022	SLL	Prepare trial subpoena to Amy Lanier	0.30	\$300.00	\$90.00
Service	10/18/2022	SLL	Communicate via telephone with Ryan Beam regarding how to request relief of Thomas Bates's attendance at Settlement Conference	0.20	\$300.00	\$60.00

Service	10/18/2022	DLH	Review Order setting Settlement Conference	0.20	\$100.00	\$20.00
Service	10/19/2022	JRA	Continued preparation of Response to State Farm's Motions in Limine, Response to State Farm's Trial Brief	8.50	\$350.00	\$2,975.00
Service	10/19/2022	RBM	Trial Preparation regarding cross examination of Van Dorn	5.50	\$350.00	\$1,925.00
Service	10/19/2022	SLL	Review research on FRCP 43(a).	1.50	\$300.00	\$450.00
Service	10/19/2022	CLJ	Prepare memo re Use of Zoom in Trial Under F.R.C.P. 43(a) and Proposed/Imposed Safeguards	1.50	\$300.00	\$450.00
Service	10/19/2022	CLJ	Review/analyze authority (in order to draft memo) re Use of Zoom in Trial Under F.R.C.P. 43(a) and Proposed/Imposed Safeguards	2.50	\$300.00	\$750.00
Service	10/19/2022	SLL	Review order from Judge Dishman on meet and confer for rule 43 motion.	0.10	\$300.00	\$30.00
Service	10/19/2022	SLL	Prepare email correspondence to Defendant's counsel regarding meet and confer pursuant to court order	0.20	\$300.00	\$60.00
Service	10/19/2022	SLL	Review email from Paula regarding working on safeguards.	0.10	\$300.00	\$30.00
Service	10/19/2022	SLL	Prepare email correspondence to Paula Williams regarding excusing Thomas Bates's attendance at settlement conference.	0.20	\$300.00	\$60.00
Service	10/19/2022	SLL	Review email from Paula Williams, no objection as to seeking relief from court as to not have Thomas Bates at settlement conference	0.10	\$300.00	\$30.00
Service	10/19/2022	SLL	Review email from Nyssa Vasquez regarding oral rulings in light of settlement conference	0.10	\$300.00	\$30.00
Service	10/19/2022	SLL	Prepare (begin) Settlement conference statement	4.50	\$300.00	\$1,350.00
Service	10/19/2022	SLL	Review deposition testimony of Lanier in preparation of meeting to prep for trial and settlement conference statement	1.90	\$300.00	\$570.00
Service	10/19/2022	RBM	Review and revise Motions in Limine Responses	1.10	\$350.00	\$385.00
Service	10/19/2022	RBM	Review and revise Settlement Conference Statement	0.80	\$350.00	\$280.00

Service	10/20/2022	JRA	Finished preparation of Response to State Farm's Motions in Limine	1.80	\$350.00	\$630.00
Service	10/20/2022	RBM	Trial preparation re: Cross examination of Arnold deposition	7.20	\$350.00	\$2,520.00
Service	10/20/2022	SLL	Review email from Lance Leffel, State Farm would like rulings in advance of settlement conference	0.10	\$300.00	\$30.00
Service	10/20/2022	SLL	Prepare email correspondence to Nyssa Vasquez regarding telephonic hearing on motions.	0.20	\$300.00	\$60.00
Service	10/20/2022	SLL	Prepare Motion for relief from Thomas Bates's attendance at settlement conference and proposed Order re: same	1.00	\$300.00	\$300.00
Service	10/20/2022	SLL	Prepare proposed Order granting our Motion to excuse Thomas Bates from settlement conference	0.20	\$300.00	\$60.00
Service	10/20/2022	SLL	Review email correspondence from Nyssa Vasquez regarding call to discuss oral rulings from Judge Dishman	0.10	\$300.00	\$30.00
Service	10/20/2022	SLL	Prepare (continue) settlement conference statement	5.40	\$300.00	\$1,620.00
Service	10/20/2022	SLL	Prepare Settlement Conference cover sheet pursuant to court order	0.40	\$300.00	\$120.00
Service	10/20/2022	SLL	Review Order setting telephonic conference	0.10	\$300.00	\$30.00
Service	10/20/2022	SLL	Review correspondence from Nyssa Vasquez regarding telephonic conference with Judge Dishman	0.10	\$300.00	\$30.00
Service	10/20/2022	RBM	Review and revise Trial Brief	1.80	\$350.00	\$630.00
Service	10/21/2022	SLL	Prepare objections to Counter-designations of Mendoza.	1.70	\$300.00	\$510.00
Service	10/21/2022	SLL	Prepare revisions to Settlement Conference Statement to cut to five page limit pursuant to court order	2.20	\$300.00	\$660.00
Service	10/21/2022	SLL	Prepare exhibits to our response to Trial Brief	0.60	\$300.00	\$180.00
Service	10/21/2022	SLL	Prepare exhibits to our response to State Farm's motions in limine	0.80	\$300.00	\$240.00
Service	10/21/2022	SLL	Prepare objections to Defendant's jury instructions.	2.80	\$300.00	\$840.00
Service	10/21/2022	SLL	Review proposed Rule 43(a) Motion.	1.40	\$300.00	\$420.00



Service	10/21/2022	SLL	Conference call with Lance Leffel and Paula Williams regarding rule 43(a) motion.	0.40	\$300.00	\$120.00
Service	10/21/2022	SLL	In-firm meeting with Brad Miller and Jami Antonisse regarding trial prep, use of FRE 807.	0.60	\$300.00	\$180.00
Service	10/21/2022	SLL	Prepare email correspondence Judge Green and State Farm counsel regarding settlement conference statement	0.20	\$300.00	\$60.00
Service	10/21/2022	SLL	Prepare email correspondence to Gary Bates regarding our settlement conference statement, Defendant's trial brief, our response.	0.40	\$300.00	\$120.00
Service	10/21/2022	SLL	Communicate via telephone with Gary and Marian Bates regarding use of FRE 807 and what his dad has gone through.	0.50	\$300.00	\$150.00
Service	10/21/2022	SLL	Review email from Gary Bates regarding testimony as to what his dad has gone through because of State Farm	0.30	\$300.00	\$90.00
Service	10/21/2022	SLL	Review certified copies of annual statements (413 pages) and compare to annual statements produced in discovery (350 pages) due to different page count	7.60	\$300.00	\$2,280.00
Service	10/22/2022	SLL	Communicate with Gary Bates and Marian Bates via telephone regarding testimony as outlined in their email.	0.40	\$300.00	\$120.00
Service	10/22/2022	RBM	Trial preparation re: Cross examination of Draper	2.70	\$350.00	\$945.00
Service	10/22/2022	SLL	Prepare FRE 807 notice as to Gary Bates' testimony about Thomas Bates	1.20	\$300.00	\$360.00
Service	10/22/2022	SLL	Begin review of OGs, jurisdictional references, standard claim processes for policies relating to documentation of claim file.	5.60	\$300.00	\$1,680.00
Service	10/23/2022	RBM	Trial preparation re: Cross examination of Draper	5.00	\$350.00	\$1,750.00
Service	10/24/2022	SLL	Review State Farm's Settlement Conference statement and cover sheet	1.30	\$300.00	\$390.00
Service	10/24/2022	RBM	Trial preparation re: Cross examination of Jacome	7.20	\$350.00	\$2,520.00
Service	10/24/2022	SLL	Prepare email correspondence to Gary Bates regarding State Farm's settlement conference statement and our position.	0.50	\$300.00	\$150.00
Service	10/24/2022	SLL	Review correspondence from Lance Leffel	0.20	\$300.00	\$60.00

			regarding objection to proposed testimony of Bates, whether we object to Motion.			
Service	10/24/2022	SLL	Prepare email correspondence to Lance Leffel regarding no objection to supplemental motion on Gary Bates's testimony	0.20	\$300.00	\$60.00
Service	10/24/2022	SLL	Prepare trial subpoena of Jonathan Marks.	0.30	\$300.00	\$90.00
Service	10/24/2022	SLL	Review email correspondence from Marian Bates with her thoughts about State Farm's settlement conference statement and rebuttal	0.30	\$300.00	\$90.00
Service	10/24/2022	SLL	Review and respond to correspondence from Paula Williams regarding Veritext and exhibits.	0.30	\$300.00	\$90.00
Service	10/24/2022	SLL	Review Order granting Thomas Bates excused from settlement conference.	0.20	\$300.00	\$60.00
Service	10/24/2022	SLL	Review State Farm's Motion to Supplement MIL.	0.60	\$300.00	\$180.00
Service	10/24/2022	SLL	Review proposed Order on State Farm's Motion to Supplement MIL.	0.20	\$300.00	\$60.00
Service	10/24/2022	SLL	Prepare correspondence to Janna Mcguire regarding trial exhibits, veritext's platform for exhibits	0.20	\$300.00	\$60.00
Service	10/24/2022	SLL	Review email from Janna McGuire regarding exhibit sharing platform	0.10	\$300.00	\$30.00
Service	10/24/2022	SLL	Prepare email correspondence to Paula Williams regarding revision to rule 43(a) motion on Draper	0.20	\$300.00	\$60.00
Service	10/25/2022	SLL	Review email from Paula Williams regarding test run of exhibits.	0.10	\$300.00	\$30.00
Service	10/25/2022	JRA	Begin preparation of Response to Defendant's Supplemental Motion in Limine	6.00	\$350.00	\$2,100.00
Service	10/25/2022	RBM	Meet with Amy Lanier	3.70	\$350.00	\$1,295.00
Service	10/25/2022	SLL	Review and prepare revisions to proposed Motion on Rule 43(a).	0.60	\$300.00	\$180.00
Service	10/25/2022	SLL	Review Paula Williams's withdrawals of designations of deposition testimony of Anthony Mendoza	1.00	\$300.00	\$300.00
Service	10/25/2022	SLL	Prepare email correspondence to Paula Williams regarding no objections to withdrawals of portions of Mendoza testimony	0.10	\$300.00	\$30.00

Service	10/25/2022	SLL	Attend trial prep meeting with Amy Lanier.	3.70	\$300.00	\$1,110.00
Service	10/25/2022	SLL	Attend trial prep meeting with Jonathan Marks	3.20	\$300.00	\$960.00
Service	10/25/2022	SLL	Discuss trial strategy with Brad Miller	2.40	\$300.00	\$720.00
Service	10/25/2022	RBM	Meet with Shawna Landeros re: Trial Strategy	2.40	\$350.00	\$840.00
Service	10/25/2022	RBM	Meet with Jonathan Marks	3.20	\$350.00	\$1,120.00
Service	10/26/2022	JRA	Continued preparation of Response to Supplemental Motion in Limine	3.20	\$350.00	\$1,120.00
Service	10/26/2022	RBM	Trial Preparation re: Exhibits use in cross examination	4.80	\$350.00	\$1,680.00
Service	10/26/2022	SLL	Review email correspondence from Marian Bates regarding settlement conference, Jack Buben is auto representative	0.20	\$300.00	\$60.00
Service	10/26/2022	SLL	Prepare email correspondence to Marian Bates regarding settlement conference, Jack Buben not involved in underlying claim	0.20	\$300.00	\$60.00
Service	10/26/2022	SLL	Review Minute Entry for status conference	0.10	\$300.00	\$30.00
Service	10/26/2022	SLL	Prepare revisions to response to State Farm's supplemental motion in limine as to Gary Bates's testimony	1.80	\$300.00	\$540.00
Service	10/26/2022	SLL	Review Order on Motions hearing and Pretrial Conference	0.20	\$300.00	\$60.00
Service	10/26/2022	SLL	Review Order granting Motion under 43(a) for Draper	0.40	\$300.00	\$120.00
Service	10/26/2022	SLL	Review correspondence from Paula Williams as to Plaintiff's exhibits	0.20	\$300.00	\$60.00
Service	10/26/2022	SLL	Review of additions noted to certified copies of annual statements of State Farm (63 pages)	1.80	\$300.00	\$540.00
Service	10/26/2022	RBM	Review State Farm Annual Statements	2.20	\$350.00	\$770.00
Service	10/26/2022	RBM	Prepare for and attend zoom status conference re: Motions in Limine with Shawna Landeros	0.80	\$350.00	\$280.00
Service	10/27/2022	JRA	Research re: curative instructions and preparation of same	1.50	\$350.00	\$525.00
Service	10/27/2022	RBM	Preparation for and attendance to Settlement Conference	6.70	\$350.00	\$2,345.00
Service	10/27/2022	SLL	Attend Settlement Conference, case did not	3.50	\$300.00	\$1,050.00

settle						
Service	10/27/2022	SLL	Post-settlement conference meeting with Gary and Marian Bates regarding trial	0.50	\$300.00	\$150.00
Service	10/27/2022	SLL	Review correspondence from Paula Williams regarding court cannot test IT with veritext until Monday	0.10	\$300.00	\$30.00
Service	10/27/2022	SLL	Prepare email correspondence to Janna McGuire regarding testing IT with the Court and veritext	0.20	\$300.00	\$60.00
Service	10/27/2022	SLL	Review email correspondence from Janna McGuire regarding agreement to be there for testing of IT and exhibits	0.10	\$300.00	\$30.00
Service	10/27/2022	SLL	Review proposed examination of Jonathan Marks and prepare additions, revisions	1.70	\$300.00	\$510.00
Service	10/27/2022	SLL	Prepare email correspondence to Paula Williams regarding testing with Veritext	0.10	\$300.00	\$30.00
Service	10/27/2022	SLL	Review Order from Judge Green, case did not settle	0.10	\$300.00	\$30.00
Service	10/27/2022	SLL	Review and analyze order rejecting Final Pretrial Report	0.80	\$300.00	\$240.00
Service	10/27/2022	SLL	Review correspondence from Nyssa Vasquez regarding confirming exhibits to JERS	0.20	\$300.00	\$60.00
Service	10/27/2022	SLL	Prepare email correspondence to Paula Williams regarding withdrawal of certain PX exhibits, certified annual statements and Ms. Arnold's attendance at trial	0.30	\$300.00	\$90.00
Service	10/27/2022	SLL	Prepare email correspondence to Paula Williams regarding meet and confer and new Pretrial report	0.20	\$300.00	\$60.00
Service	10/27/2022	SLL	Review email correspondence from Nyssa Vasquez as to whether oral argument is anticipated at Pretrial conference	0.10	\$300.00	\$30.00
Service	10/27/2022	SLL	Review email from Paula Williams regarding agreement to meet and confer on exhibits	0.10	\$300.00	\$30.00
Service	10/27/2022	SLL	Review email correspondence from Paula Williams regarding clarification as to Sharon Arnold attendance at trial	0.10	\$300.00	\$30.00
Service	10/27/2022	SLL	Prepare email correspondence to Paula Williams regarding our position as to Arnold's attendance, constraints because of Draper's limited availability, first day of trial	0.20	\$300.00	\$60.00

is full and second day is Draper						
Service	10/27/2022	SLL	Prepare outline for direct examination of Amy Lanier	4.80	\$300.00	\$1,440.00
Service	10/27/2022	SLL	Review our proposed jury instructions and State Farm's objections to our proposed jury instructions	1.40	\$300.00	\$420.00
Service	10/28/2022	RBM	Prepare for final pretrial conference	3.40	\$350.00	\$1,190.00
Service	10/28/2022	SLL	Plan and prepare for hearing on motions by reviewing our motions in limine, State Farm's response to our motions in limine, State Farm's motions in limine, our response to State Farm's motions in limine	2.50	\$300.00	\$750.00
Service	10/28/2022	SLL	Review our designations of deposition testimony of Mendoza and State Farm's objections thereto to prepare for hearing	1.40	\$300.00	\$420.00
Service	10/28/2022	SLL	Review State Farm's proposed jury instructions and our objections thereto to prepare for hearing	0.80	\$300.00	\$240.00
Service	10/28/2022	SLL	Attend Pretrial Conference and hearing in front of Judge Dishman	4.50	\$300.00	\$1,350.00
Service	10/28/2022	SLL	Communications with Brad Miller and Lance Leffel regarding joint exhibits	1.20	\$300.00	\$360.00
Service	10/28/2022	SLL	Review Minute Order as to proceedings and rulings	0.20	\$300.00	\$60.00
Service	10/28/2022	SLL	Review Minute Order as to Pretrial Conference	0.20	\$300.00	\$60.00
Service	10/28/2022	SLL	Prepare revised list of Joint Exhibits with reference to prior bates ranges for identification	4.60	\$300.00	\$1,380.00
Service	10/28/2022	RBM	Attend final pretrial conference	4.20	\$350.00	\$1,470.00
Service	10/29/2022	RBM	Trial Preparation re: Review and revise Amy Lanier testimony outline	1.20	\$350.00	\$420.00
Service	10/29/2022	SLL	Review and analyze State Farm's demonstrative exhibit, compare timeline to claim file	0.80	\$300.00	\$240.00
Service	10/29/2022	SLL	Prepare addition to Joint Exhibit list and send to Lance Leffel	0.30	\$300.00	\$90.00
Service	10/29/2022	SLL	Prepare stipulation as to facts from State Farm's discovery responses	0.80	\$300.00	\$240.00
Service	10/29/2022	SLL	Prepare email correspondence to Lance Leffel regarding proposed stipulation	0.20	\$300.00	\$60.00

Service	10/29/2022	SLL	Review and analyze detailed and redlined joint exhibit list from Paula Williams, compare to bates ranges from prior exhibits	2.50	\$300.00	\$750.00
Service	10/29/2022	SLL	Review Cisco requirements for remote testimony of Draper	0.30	\$300.00	\$90.00
Service	10/29/2022	SLL	Prepare email correspondence to Janna McGuire regarding court not using zoom, using Cisco	0.20	\$300.00	\$60.00
Service	10/29/2022	SLL	Prepare revision to stipulation as to statistical facts outlined in discovery responses	0.40	\$300.00	\$120.00
Service	10/29/2022	SLL	Prepare correspondence to Paula Williams as to agreements reached in joint exhibits	0.40	\$300.00	\$120.00
Service	10/29/2022	SLL	Review upcoming trial deadlines ordered by the Court as to Final Pretrial Report, stipulations, rule of sequestration, exhibit notebooks, and deposition testimony of Mendoza	0.40	\$300.00	\$120.00
Service	10/29/2022	SLL	Review State Farm discovery responses as to complying with policy in terms of reporting of claim	0.40	\$300.00	\$120.00
Service	10/29/2022	SLL	Prepare (begin) outline of Gary Bates for direct examination	3.60	\$300.00	\$1,080.00
Service	10/29/2022	RBM	Prepare for Opening	3.50	\$350.00	\$1,225.00
Service	10/29/2022	RBM	Trial Preparation re: Review and revise Gary Bates testimony outline	1.40	\$350.00	\$490.00
Service	10/30/2022	DLH	Prepare trial exhibit notebooks	9.00	\$100.00	\$900.00
Service	10/30/2022	AMT	Trial strategy session with Brad Miller re: Opening Statement (No charge)	1.50	\$0.00	\$0.00
Service	10/30/2022	RBM	Trial Preparation regarding all phases from opening to closing	11.30	\$350.00	\$3,955.00
Service	10/30/2022	SLL	Review email correspondence from Paula Williams as to agreement as to revised stipulation, but removal of certain joint exhibit pages	0.30	\$300.00	\$90.00
Service	10/30/2022	SLL	Prepare revisions to Final Pretrial Report	0.90	\$300.00	\$270.00
Service	10/30/2022	SLL	Prepare email correspondence to Paula Williams regarding revisions to Final Pretrial Report, stipulation not to be read at outset, creating separate exhibit lists for Joint Exhibits, Plaintiff's, and Defendant's	0.30	\$300.00	\$90.00
Service	10/30/2022	SLL	Review edits to Final Pretrial Report from	0.40	\$300.00	\$120.00

Paula Williams						
Service	10/30/2022	SLL	Review email correspondence from Paula Williams as to another objection to training materials previously agreed to as joint exhibit	0.20	\$300.00	\$60.00
Service	10/30/2022	SLL	Prepare email correspondence to Paula Williams, will work on renumbering joint exhibits because one will be withdrawn as joint	0.20	\$300.00	\$60.00
Service	10/30/2022	SLL	Prepare email correspondence to Paula Williams, leaving Marian Bates as witness though odds of us calling her are very slim	0.20	\$300.00	\$60.00
Service	10/30/2022	SLL	Prepare revisions to Joint Exhibits and recirculate to Paula Williams	1.00	\$300.00	\$300.00
Service	10/30/2022	SLL	Review email from Paula Williams regarding including all pipe jack photos as joint exhibit	0.10	\$300.00	\$30.00
Service	10/30/2022	SLL	Prepare Plaintiff's Additional Exhibit List	1.30	\$300.00	\$390.00
Service	10/30/2022	SLL	Prepare final revisions to Pretrial Report considering State Farm redlines	0.30	\$300.00	\$90.00
Service	10/30/2022	SLL	Prepare email correspondence to Paula Williams regarding Final Pretrial Report, Plaintiff's additional Exhibit list with incorporated prior objections from State Farm, and need for Defendant's list	0.30	\$300.00	\$90.00
Service	10/30/2022	SLL	Review email from Paula Williams regarding adding JobNimbus pages	0.10	\$300.00	\$30.00
Service	10/30/2022	SLL	Prepare email correspondence to Paula Williams regarding adding jobnimbus pages to JX 15	0.20	\$300.00	\$60.00
Service	10/30/2022	SLL	Prepare OKWD form for Joint Exhibits	0.90	\$300.00	\$270.00
Service	10/30/2022	SLL	Prepare email correspondence to Paula Williams regarding need for Defendant's exhibit list and OKWD form for exhibits	0.20	\$300.00	\$60.00
Service	10/30/2022	SLL	Review email correspondence from Paula Williams regarding revised objections to Plaintiff's exhibits, change signature on Final Pretrial Report, and Defendant's exhibits	0.20	\$300.00	\$60.00
Service	10/30/2022	SLL	Prepare revision to Final Pretrial Report per Paula Williams	0.20	\$300.00	\$60.00
Service	10/30/2022	SLL	Prepare Plaintiff's exhibit list using WDOK form	0.50	\$300.00	\$150.00



Service	10/30/2022	SLL	Prepare proposed Order accepting Final Pretrial Report	0.20	\$300.00	\$60.00
Service	10/30/2022	SLL	Prepare email correspondence to Paula Williams regarding unable to insert objections to Defendant's supplemental exhibit list since sent so late, intent to file additional objections with the court	0.20	\$300.00	\$60.00
Service	10/30/2022	SLL	Review email from Paula Williams, no objection to supplemental objections to Defendant's exhibit list	0.10	\$300.00	\$30.00
Service	10/30/2022	SLL	Prepare our objections to Defendant's additional exhibits	0.30	\$300.00	\$90.00
Service	10/30/2022	SLL	Prepare Notice to the Court of Unopposed Supplemental objections to Defendant's Exhibits	0.20	\$300.00	\$60.00
Service	10/30/2022	SLL	Prepare email correspondence to Paula Williams regarding need for Defendant's exhibit list on WDOK form	0.20	\$300.00	\$60.00
Service	10/30/2022	SLL	Review and respond to email from Paula Williams regarding meet and confer on Mendoza objections	0.20	\$300.00	\$60.00
Service	10/30/2022	SLL	Review Defendant's exhibit list on WDOK form	0.30	\$300.00	\$90.00
Service	10/30/2022	SLL	Prepare email correspondence to orders inbox regarding Final Pretrial Report, exhibit lists and supplemental objections	0.20	\$300.00	\$60.00
Service	10/30/2022	SLL	Prepare email correspondence to orders inbox regarding Joint Exhibits and Plaintiff's additional exhibits on WDOK form per court order	0.20	\$300.00	\$60.00
Service	10/30/2022	SLL	Review and respond to email from Janet Wright regarding clarification on JX 14	0.30	\$300.00	\$90.00
Service	10/30/2022	SLL	Review and analyze proposed Rule of Sequestration	0.30	\$300.00	\$90.00
Service	10/30/2022	SLL	Confer with Paula Williams regarding Mendoza designations and objections	0.60	\$300.00	\$180.00
Service	10/30/2022	SLL	Review correspondence from Paula Williams regarding agreements reached as to Mendoza testimony	0.30	\$300.00	\$90.00
Service	10/30/2022	SLL	Communicate with Brad Miller regarding Mendoza objections	0.40	\$300.00	\$120.00
Service	10/30/2022	JRA	Trial strategy session with Brad Miller re: Opening Statement (No Charege)	1.50	\$0.00	\$0.00

Service	10/31/2022	DLH	Prepare additional trial notebooks for Jacquelyn Draper per court order.	6.00	\$100.00	\$600.00
Service	10/31/2022	RBM	Trial Preparation including all phases from pending legal issues to closing arguments	9.20	\$350.00	\$3,220.00
Service	10/31/2022	SLL	Prepare correspondence to Paula Williams regarding withdrawals as to Mendoza testimony	0.20	\$300.00	\$60.00
Service	10/31/2022	SLL	Review email correspondence from Paula Williams regarding agreement reached as to Mendoza designations	0.10	\$300.00	\$30.00
Service	10/31/2022	SLL	Prepare summary of outstanding issues regarding Mendoza and circulate to Paula Williams	0.40	\$300.00	\$120.00
Service	10/31/2022	SLL	Prepare email correspondence to orders inbox as to outstanding issues for Judge Dishman to rule on as to Mendoza	0.20	\$300.00	\$60.00
Service	10/31/2022	SLL	Prepare (finalize) direct examination outline for Gary Bates	3.90	\$300.00	\$1,170.00
Service	10/31/2022	SLL	Attend IT test at courthouse per court order	1.00	\$300.00	\$300.00
Service	10/31/2022	SLL	Review email from Nyssa Vasquez regarding transcript of Mendoza with designations of different color	0.10	\$300.00	\$30.00
Service	10/31/2022	SLL	Review email from Taylor Peshehonoff regarding trial rooms and deposition of Mendoza, transcripts have been dropped off	0.20	\$300.00	\$60.00
Service	10/31/2022	SLL	Prepare email correspondence to Gary Bates regarding outline of direct examination	0.20	\$300.00	\$60.00
Service	10/31/2022	SLL	Prepare email correspondence to Taylor Peshehonoff regarding plan to call Tresa Dunnican-Jacome on November 1	0.20	\$300.00	\$60.00
Service	10/31/2022	SLL	Prepare agreed list of withdrawn testimony of Mendoza in order to cut video	0.50	\$300.00	\$150.00
Service	10/31/2022	SLL	Review email from Nyssa Vasquez regarding witness rooms, handling of exhibits	0.10	\$300.00	\$30.00
Service	10/31/2022	SLL	Prepare email correspondence to Paula Williams regarding Notice of Agreement on motion in limine as to other claim files	0.20	\$300.00	\$60.00
Service	10/31/2022	SLL	Review email from Paula Williams regarding revised list of withdrawn testimony of Mendoza	0.20	\$300.00	\$60.00

Service	10/31/2022	SLL	Review email correspondence from Paula Williams as to use of stipulations	0.20	\$300.00	\$60.00
Service	10/31/2022	SLL	Review Order approving Final Pretrial Report	0.20	\$300.00	\$60.00
Service	10/31/2022	SLL	Review and analyze Preliminary jury instructions sent by Nyssa Vasquez	0.50	\$300.00	\$150.00
Service	10/31/2022	SLL	Prepare email correspondence to Paula Williams regarding when stipulations would be read to jury	0.20	\$300.00	\$60.00
Service	10/31/2022	SLL	Review Order as to Mendoza objections to designations of deposition testimony	0.50	\$300.00	\$150.00
Service	10/31/2022	SLL	Prepare email correspondence to Janna McGuire to cut video pursuant to Court order ruling on Mendoza objections	0.20	\$300.00	\$60.00
Service	10/31/2022	SLL	Review and analyze email from Taylor Peshehonoff regarding stipulation, no need for court to rule on outstanding Motion in limine as to other claim files	0.20	\$300.00	\$60.00
Service	10/31/2022	SLL	Compare JX 15 and JX26 photographs to claim file to determine which did not make it to claim file, 6 photos did not get to claim file	1.00	\$300.00	\$300.00
Service	10/31/2022	SLL	Review and analyze correspondence from Nyssa Vasquez regarding exhibits and review exhibits mentioned and brainstorm solution to resolve issues with exhibits not loading	0.50	\$300.00	\$150.00
Service	10/31/2022	SLL	Prepare email correspondence to Taylor Peshehonoff regarding stipulation and agreement, this was not our understanding of agreement, reference to prior correspondence	0.20	\$300.00	\$60.00
Service	10/31/2022	SLL	Prepare email correspondence to Nyssa Vasquez regarding no objection to Rule 615 rule of sequestration instruction	0.20	\$300.00	\$60.00
Service	10/31/2022	SLL	Attend trial preparation meeting with Gary Bates	3.20	\$300.00	\$960.00
Service	11/01/2022	JLJ	Attend trial for purposes of monitoring jury selection (No Charge)	2.00	\$0.00	\$0.00
Service	11/01/2022	JRA	Attend jury selection, opening statements, and Gary Bates testimony; provide feedback re: strategy; prepare notes in preparation for closing arguments and appeal	8.00	\$350.00	\$2,800.00

Service	11/01/2022	DLH	Upload and send link for Mendoza testimony designations	0.20	\$100.00	\$20.00
Service	11/01/2022	DLH	Revise, prepare and upload Trial Exhibits per court	1.00	\$100.00	\$100.00
Service	11/01/2022	DLH	Contact Veritext-confirm exhibits for the trial testimony of Jacqueline Draper	0.20	\$100.00	\$20.00
Service	11/01/2022	AMT	Attend jury trial and discuss strategy re: voir dire, opening statements, Gary Bates testimony with team re: Jury observations relative to opening, witness direct and cross examination (No Charge)	8.00	\$0.00	\$0.00
Service	11/01/2022	RBM	Trial of case; select jury; opening statements; first witness Gary Bates; prepare for Day 2	15.30	\$350.00	\$5,355.00
Service	11/01/2022	DLH	Review final video cut of deposition designations of trial witness Anthony Mendoza	1.50	\$100.00	\$150.00
Service	11/01/2022	SLL	Review final cut from Janna McGuire of Mendoza testimony to ensure withdrawn testimony has been removed and sustained objections removed	1.20	\$300.00	\$360.00
Service	11/01/2022	SLL	Correspondence with Janna McGuire, four areas of testimony of Mendoza were not removed	0.20	\$300.00	\$60.00
Service	11/01/2022	SLL	Attend trial including voir dire, opening statements, testimony of Gary Bates	8.00	\$300.00	\$2,400.00
Service	11/01/2022	SLL	Review Minute Order for day one of trial	0.20	\$300.00	\$60.00
Service	11/01/2022	SLL	Compare timeline of text messages between Draper and Jacome to timeline of claim file entries and audit trail, and testimony of Jacome in her deposition regarding timing of inspection and file notes, for use in cross-examination of Jacome; other trial prep for day 2	4.30	\$300.00	\$1,290.00
Service	11/02/2022	JRA	Attend trial for Jacome testimony, Mendoza testimony, and Draper testimony; prepare notes for closing and appeal; provide feedback to trial team re: strategy	10.00	\$350.00	\$3,500.00
Service	11/02/2022	SLL	Attend trial day 2, court rulings, testimony of Jacome, start of Draper, Mendoza	10.50	\$300.00	\$3,150.00
Service	11/02/2022	AMT	Attend trial for testimony of Jacome, first attempt of Draper, and Mendoza; discuss trial strategy throughout re: jury observations relative to witness direct and cross examination (No Charge)	10.00	\$0.00	\$0.00

Service	11/02/2022	RBM	Trial of case; witness Tressa Jacome; witness Jacqueline Draper (interrupted); video Anthony Mendoza; prepare for Day 3	14.80	\$350.00	\$5,180.00
Service	11/02/2022	DLH	Review videos for trial in light of Defendant argument that videos support half inch from edge as definition of edge, this is not in videos	2.50	\$100.00	\$250.00
Service	11/02/2022	SLL	Review research as to new roofing statute on absorbing deductible, raised for first time at trial	0.30	\$300.00	\$90.00
Service	11/02/2022	SLL	Review correspondence from Nyssa Vasquez regarding remote testimony of Draper	0.20	\$300.00	\$60.00
Service	11/02/2022	SLL	Review minute entry for day 2 of trial	0.20	\$300.00	\$60.00
Service	11/02/2022	SLL	Prepare revisions to outline of Amy Lanier to shorten testimony pursuant to court instruction	2.20	\$300.00	\$660.00
Service	11/02/2022	SLL	Prepare summary of testimony to date for use in arguing in opposition of judgment as a matter of law	2.40	\$300.00	\$720.00
Service	11/02/2022	JRA	Research re: New roofing laws raised for the first time at trial	1.00	\$350.00	\$350.00
Service	11/03/2022	JRA	Attend trial for remainder of Draper testimony, Arnold testimony; consult with team; prepare notes for closing and appeal	10.00	\$350.00	\$3,500.00
Service	11/03/2022	AMT	Attend trial for testimony of Arnold, continued testimony of Draper; discuss trial strategy throughout re: jury observations relative to witness direct and cross examination (No Charge)	10.00	\$0.00	\$0.00
Service	11/03/2022	RBM	Trial of case; witness Sharon Arnold; witness Jacqueline Draper; prepare for Day 4	14.30	\$350.00	\$5,005.00
Service	11/03/2022	SLL	Confer with counsel for State Farm regarding plan to streamline testimony pursuant to Court order	0.40	\$300.00	\$120.00
Service	11/03/2022	SLL	Attend trial day 3, Sharon Arnold and conclusion of Draper testimony, objections as to joint exhibit	10.50	\$300.00	\$3,150.00
Service	11/03/2022	SLL	Conduct research as to legal standard on Judgment as a matter of law, standard on bad faith, standard on punitive damages	2.60	\$300.00	\$780.00
Service	11/03/2022	SLL	Prepare argument in opposition to Judgment as a matter of law with facts in	3.10	\$300.00	\$930.00

support of our position						
Service	11/04/2022	JRA	Attend trial for Lanier, Thomas Bates, Marks and beginning of Van Dorn testimony, consult re: arguments on motion for judgment as a matter of law and evidentiary issues; took notes in preparation for jury instruction conference, closing arguments and appeal	10.00	\$350.00	\$3,500.00
Service	11/04/2022	SLL	Attend trial day 4, including discussion of timing of witnesses, testimony of Amy Lanier, Thomas Bates, Jonathan Marks, Plaintiff rests, argument as to JMOL, objection to vent cap, start of VanDorn	10.00	\$300.00	\$3,000.00
Service	11/04/2022	AMT	Attend trial for testimony of Lanier, Thomas Bates, Marks, and beginning of Van Dorn; arguments on motion for judgment as a matter of law; research on surprise demonstratives and in court demonstrations; discuss trial strategy throughout re: jury observations relative to witness direct and cross examination (No Charge)	10.00	\$0.00	\$0.00
Service	11/04/2022	RBM	Trial of case; witness Amy Lanier; witness Thomas Bates; witness Jonathon Marks; directed verdict arguments	10.00	\$350.00	\$3,500.00
Service	11/04/2022	SLL	Begin preparation of summary of testimony to date to assist with closing argument with themes which have presented	2.50	\$300.00	\$750.00
Service	11/04/2022	SLL	Review minute entry for day 3 of trial	0.20	\$300.00	\$60.00
Service	11/05/2022	SLL	Prepare Notice of Mendoza's testimony for filing pursuant to Court order, since we are proponent of testimony	0.40	\$300.00	\$120.00
Service	11/05/2022	RBM	Preparation for Day 5	9.50	\$350.00	\$3,325.00
Service	11/05/2022	SLL	Prepare for jury instruction conference with Heath Albert by reviewing objections and proposed instructions from Plaintiff and Defendant	2.00	\$300.00	\$600.00
Service	11/05/2022	SLL	Review case law cited at trial regarding exclusion or admission of vent cap in order to argue issue	1.30	\$300.00	\$390.00
Service	11/06/2022	JLJ	Conference with RBM re: closing argument strategy; Analysis of court's proposed jury instructions	2.50	\$350.00	\$875.00
Service	11/06/2022	JRA	Continued preparation of notes for jury instruction conference and closing arguments	6.00	\$350.00	\$2,100.00

Service	11/06/2022	SLL	Review proposed instructions and verdict forms from Heath Albert.	1.60	\$300.00	\$480.00
Service	11/06/2022	AMT	Analyze and summarize trial notes particularly regarding jury observation/ reactions to direct testimony and cross examination along with focus on exhibits meaningful to jurors for assistance in preparation for closing arguments	3.50	\$300.00	\$1,050.00
Service	11/06/2022	RBM	Preparation for Day 5 to include closing argument	11.20	\$350.00	\$3,920.00
Service	11/06/2022	SLL	Finalize notes for closing argument	1.80	\$300.00	\$540.00
Service	11/06/2022	SLL	Communicate via telephone with Brad Miller and Jami Antonisse regarding closing argument, jury instruction conference	0.60	\$300.00	\$180.00
Service	11/06/2022	SLL	Attend Jury Instruction Conference via telephone	1.90	\$300.00	\$570.00
Service	11/06/2022	SLL	Review and analyze lengthy email correspondence from Taylor Peshehonoff with additional case law regarding vent cap admission at trial	0.50	\$300.00	\$150.00
Service	11/06/2022	SLL	Review and analyze case law cited by State Farm regarding admission of demonstrative aid	1.10	\$300.00	\$330.00
Service	11/06/2022	SLL	Prepare Jury Instruction as to stipulations 5 through 8	0.30	\$300.00	\$90.00
Service	11/06/2022	SLL	Prepare three alternative jury instructions on General Measure of Damages	0.60	\$300.00	\$180.00
Service	11/06/2022	SLL	Review and analyze State Farm annual statements for use in stage 2 if jury checks box tomorrow (413 pages)	5.80	\$300.00	\$1,740.00
Service	11/06/2022	SLL	Review and analyze State Farm v Campbell, raised at jury instruction conference and to be argued tomorrow	1.60	\$300.00	\$480.00
Service	11/06/2022	SLL	Prepare summary of pertinent State Farm annual statements for use in stage 2	1.60	\$300.00	\$480.00
Service	11/07/2022	JRA	Attend trial for continuation of Van Dorn testimony, jury instructions, and closing arguments	7.00	\$350.00	\$2,450.00
Service	11/07/2022	AMT	Attend trial for testimony of Van Dorn re: jury reactions to direct and cross examination, jury instructions, closing arguments, jury questions, verdict; trial strategy throughout (No Charge)	14.20	\$0.00	\$0.00



Service	11/07/2022	SLL	Attend trial, including motions, testimony of VanDorn, jury instructions, deliberations, verdict	14.20	\$300.00	\$4,260.00
Service	11/07/2022	RBM	Trial of case; witness Derek Van Dorn; closing arguments; receive verdict	14.20	\$350.00	\$4,970.00
Service	11/07/2022	DLH	Draft and file Notice of Testimony of Anthony Mendoza w exhibit	0.30	\$100.00	\$30.00
Service	11/08/2022	JRA	Review federal and local rules re: entry of judgment and requests for fees and costs; begin preparation of Bill of Costs	2.80	\$350.00	\$980.00
Service	11/08/2022	SLL	Review minute entry for trial day 4	0.20	\$300.00	\$60.00
Service	11/08/2022	SLL	Review minute entry for trial day 5	0.20	\$300.00	\$60.00
Service	11/08/2022	SLL	Review court jury instructions	0.60	\$300.00	\$180.00
Service	11/08/2022	SLL	Review jury questions, responses and notes	0.20	\$300.00	\$60.00
Service	11/08/2022	SLL	Review completed jury verdict form	0.20	\$300.00	\$60.00
Service	11/08/2022	SLL	Review Judgment entered by Judge Dishman	0.20	\$300.00	\$60.00
Service	11/10/2022	JRA	Continue preparation of Bill of Costs and Brief in Support	2.20	\$350.00	\$770.00
Service	11/14/2022	JRA	Continued preparation of Brief in Support of Bill of Costs	3.00	\$350.00	\$1,050.00
Service	11/14/2022	JRA	Begin preparation of Plaintiff's Motion for Attorney Fees	4.30	\$350.00	\$1,505.00
Service	11/19/2022	JRA	Continued preparation of Motion for Attorney Fees	9.70	\$350.00	\$3,395.00
Service	11/19/2022	RBM	Prepare affidavit in support of Motion for Attorney Fees	2.80	\$350.00	\$980.00
Service	11/21/2022	JRA	Continued preparation of Motion for Attorney Fees and Pre-Judgment Interest and exhibits thereto	4.30	\$350.00	\$1,505.00
Service	11/21/2022	RBM	Audit time records to attach as exhibit to Motion for Attorney Fees	3.00	\$350.00	\$1,050.00
Service	11/21/2022	RBM	Review and revise Motion for Attorney Fees	3.20	\$350.00	\$1,120.00
Service	11/22/2022	JRA	Finalize Bill of Costs, Brief in Support, Motion for Attorney Fees and Pre-Judgment Interest, and all exhibits related thereto for filing	5.40	\$350.00	\$1,890.00
					<b>Subtotal</b>	<b>\$469,445.00</b>

**Total      \$469,445.00**

## Detailed Statement of Account

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
4400	12/22/2022	\$469,445.00	\$0.00	\$469,445.00
<b>Outstanding Balance</b>				<b>\$469,445.00</b>
<b>Total Amount Outstanding</b>				<b>\$469,445.00</b>

Please make all amounts payable to: Miller Johnson Jones Antonisse & White

Please pay within 30 days.

Tax ID Number 85-4183213

# OKLAHOMA BAR ASSOCIATION

## MEMBERSHIP SURVEY 2013

### METHODOLOGY

The Oklahoma Bar Association membership survey was administered electronically by the ABA Division for Bar Services beginning in March 2013. An email notice announcing the survey and providing a link to complete was sent to 15,807 members with email addresses. The survey was closed in May 2013. A total of 1,792 responses were received, yielding an 11% overall response rate. All respondents did not respond to every question. The number of responses for each question are indicated within the data that follows.

The survey was designed jointly by the Oklahoma Bar Association and the ABA Division for Bar Services. The data collection and analysis were handled by the ABA Division for Bar Services.

The Oklahoma Bar Association previously conducted membership surveys in 1970, 1982, 1992 and 2002. Several of the questions asked in 2013 were asked in some or all previous surveys. Where applicable and/or noteworthy, the differences in responses are noted below.

### SUMMARY AND HIGHLIGHTS

#### I. Demographics (p. 6)

- Eight-eight percent of respondents are Oklahoma residents.
- Thirty-nine percent attended the University of Oklahoma.
- 60% are male (down from 78% in 1992 and 71% in 2002).
- Twenty percent are under 35 years old; 26% are over 65.

#### II. Practice Information (p. 7)

- Seventy-seven percent of respondents practice law full-time; 10% practice part-time and 12% are employed, but not in the practice of law.
- Sixteen percent of respondents plan to leave the practice of law within the next five years (12% will retire and 4% will remain employed but leave the practice of law).

#### III. Employment Setting/Law Firm (p. 9)

- Forty-seven percent of respondents are in private practice, either as a partner, associate or sole practitioner.
- Twenty-one percent are salaried employees (not in private practice).

#### IV. Billing (p. 11)

- The average number of chargeable hours produced per day has not varied significantly from 1982-2013.
- Fifty-eight percent of respondents have an hourly rate between \$151-\$250.

#### V. Firm Staffing/Offices (p. 14)

- Nine percent of law firms/practices employ the services of non-lawyer personnel other than secretaries, bookkeeper, receptionists and file clerks.
- Forty-eight percent of law firms/practices employ legal assistants or paralegals, about the same percentage as in 2002. Over half of legal assistants/paralegals spend the majority of their time on litigation.

**9. What is your average hourly rate?****1970**

Average hourly rate	1970 (n/a)
Under \$10	3%
\$10-\$15	10%
\$16-\$24	21%
\$25	23%
\$26-\$30	32%
\$31-\$40	9%
\$41-\$50	2%

**1982**

Average hourly rate	1982 (n/a)
Under \$50	3%
\$50-\$60	13%
\$61-\$85	49%
\$86-\$100	21%
\$101-\$125	9%
Over \$125	5%

**1992 and 2002**

Average hourly rate	1992 (2,845)	2002 (573)
Under \$75	5.70%	1.75%
\$76-\$85	10.20%	1.05%
\$86-\$100	31.70%	9.60%
\$101-\$125	29.00%	24.08%
\$126-\$150	14.60%	30.19%
\$151-\$200	7.60%	23.56%
Over \$200	1.30%	9.77%

**2013**

Average hourly rate	2013 (852)
Under \$100	2.23%
\$101-\$150	18.19%
\$151-\$200	34.86%
\$201-\$250	23.24%
\$251-\$300	9.39%
Over \$300	5.28%
Use a method other than hourly billing	6.81%

**10. Do you routinely put your fee agreement with the client in writing?**

Fee agreement in writing	1982 (n/a)	1992 (2,857)	2002 (599)	2013 (853)
Yes	19%	55.80%	72.29%	82.53%
Sometimes (1982)	59%	--	--	--
No	23%	44.20%	27.71%	17.47%

**11. Do you have a policy of routinely sending copies of all documents, correspondence and pleading to your client?**

All documents, correspondence and pleadings sent to clients	1970 (n/a)	1982 (n/a)	1992 (2,889)	2002 (602)	2013 (855)
Yes	29%	56%	74.40%	80.23%	83.16%
No	71%	44%	25.60%	19.77%	16.84%